

FCC SAR TEST REPORT

Application No.: SUCR2603000165TL
FCC ID: 2AH25M3WH
Applicant: Shanghai Sunmi Technology Co.,Ltd.
Manufacturer: Shanghai Sunmi Technology Co.,Ltd.
Product Name: Wireless Data Terminal
Model No.(EUT): TF31A
Trade Mark: SUNMI
Standards: FCC 47CFR §2.1093
Date of Receipt: 2025-01-08 (for report SZCR250200043801)
2025-02-10 (for report SUCR250200007209)
Date of Test: 2025-03-21 (for report SZCR250200043801)
2025-03-12 to 2025-05-06 (for report SUCR250200007209)
Date of Issue: 2026-03-23
Test conclusion: **PASS ***

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

This document is issued by the Company subject to its General Conditions of Service printed overleaf, available on request or accessible at <http://www.sgs.com/en/Terms-and-Conditions> and, for electronic format documents, subject to Terms and Conditions for Electronic Documents at <http://www.sgs.com/en/Terms-and-Conditions/Terms-e-Document>. Attention is drawn to the limitation of liability, indemnification and jurisdiction issues defined therein. Any holder of this document is advised that information contained hereon reflects the Company's findings at the time of its intervention only and within the limits of Client's instructions, if any. The Company's sole responsibility is to its Client and this document does not exonerate parties to a transaction from exercising all their rights and obligations under the transaction documents. This document cannot be reproduced except in full, without prior written approval of the Company. Any unauthorized alteration, forgery or falsification of the content or appearance of this document is unlawful and offenders may be prosecuted to the fullest extent of the law.

Unless otherwise stated the results shown in this test report refer only to the sample(s) tested and such sample(s) are retained for 30 days only.

Attention: To check the authenticity of testing / inspection report & certificate, please contact us at telephone:(86-755) 8307 1443, or email: CN.Doccheck@sgs.com



Revision Record			
Version	Description	Date	Remark
01	Original	2026-03-23	/

Authorized for issue by:		
Prepared By		Leon Liu
		Leon Liu/ Project Manager
Approved By		Nick Hu
		Nick Hu/ Technical Manager

TEST SUMMARY

Frequency Band	Maximum Reported SAR(W/kg)	
	Body	Product specific 10g SAR
WI-FI (2.4GHz)	0.97	/
WI-FI (5GHz)	1.14	/
WI-FI (6GHz)	0.91	/
Hyper WIFI	1.05	/
BT	0.69	/
NFC	/	<0.10
SAR Limited(W/kg)	1.6	4.0
Maximum Simultaneous Transmission SAR (W/kg)		
Scenario	Body	Product specific 10g SAR
Sum SAR	1.59	/
SPLSR	/	/
SPLSR Limited	0.04	0.1

Frequency Band	Reported PD (W/m ²)
WIFI 6E	9.58
PD Limit	10

Remark :

This test report (Report No.: SUCR260300016509 issue on 2026-03-23) is based on the original test report (Report No.: Report No.: SZCR250200043801 issue on 2025-05-27 and SUCR250200007209 issue on 2025-05-27).

Review this report and original report, this report just changing the parts according to the declaration letter from client.

Therefore in this report all items do not need to retest and all test data in this report are refer to the previous report with report number SZCR250200043801 issue on 2025-05-27 and SUCR250200007209 issue on 2025-05-27.

CONTENTS

1 GENERAL INFORMATION	6
1.1 Details of Client	6
1.2 Test Location	6
1.3 Test Facility	6
1.4 General Description of EUT	7
1.4.1 DUT Antenna Locations (Back View)	8
1.4.2 EUT side for SAR Testing	10
1.5 Test Specification	11
1.6 RF exposure limits	12
1.6.1 Power reduction specification	13
2 LABORATORY ENVIRONMENT	14
3 SAR MEASUREMENTS SYSTEM CONFIGURATION	15
3.1 The SAR Measurement System	15
3.2 Isotropic E-field Probe EX3DV4	17
3.3 Data Acquisition Electronics (DAE)	18
3.4 SAM Twin Phantom	18
3.5 ELI Phantom	19
3.6 Device Holder for Transmitters	20
3.7 Measurement procedure	21
3.7.1 Scanning procedure	21
3.7.2 Data Storage	23
3.7.3 Data Evaluation by SEMCAD	23
4 SAR MEASUREMENT VARIABILITY AND UNCERTAINTY	25
4.1 SAR measurement variability	25
4.2 SAR measurement uncertainty	25
5 PD MEASUREMENT UNCERTAINTY	26
6 DESCRIPTION OF TEST POSITION	28
6.1 Exposure Condition	28
6.1.1 The Body Test Position	28
6.2 Proximity Sensor Triggering Test	29
7 SAR SYSTEM VERIFICATION PROCEDURE	35
7.1 Tissue Simulate Liquid	35
7.1.1 Recipes for Tissue Simulate Liquid	35
7.1.2 Measurement for Tissue Simulate Liquid	36
7.2 SAR System Check	37
7.2.1 Justification for Extended SAR Dipole Calibrations	38
7.2.2 Summary System Check Result(s)	39
7.2.3 Detailed System Check Results	39
8 PD SYSTEM VERIFICATION PROCEDURE	40
PD System Check Setting	40
PD System Check Results	42
Detailed System Check Results	42
9 TEST CONFIGURATION	43
9.1 Operation Configurations	43
9.1.1 WiFi Test Configuration	43
9.1.2 Duty cycle	43
10 TEST RESULT	51
10.1 Measurement of RF Conducted Power	51
10.1.1 Simultaneous SAR test evaluation	52
10.1.2 Simultaneous Transmission SAR Summation Scenario	52
11 EQUIPMENT LIST	53



Report No.: SUCR260300016509
Page: 5 of 54

12 CALIBRATION CERTIFICATE 54
13 PHOTOGRAPHS..... 54

1 General Information

1.1 Details of Client

Applicant:	Shanghai Sunmi Technology Co.,Ltd.
Address:	Room 505,No.388,Song Hu Road,Yang Pu District,Shanghai,China
Manufacturer:	Shanghai Sunmi Technology Co.,Ltd.
Address:	Room 505,No.388,Song Hu Road,Yang Pu District,Shanghai,China

1.2 Test Location

Company:	SGS-CSTC Standards Technical Services (Suzhou) Co., Ltd.
Address:	South of No. 6 Plant, No. 1, Runsheng Road, Suzhou Industrial Park, Suzhou Area, China (Jiangsu) Pilot Free Trade Zone
Post code:	215000
Test Engineer:	Zhang Alan; Liu Leon-I

1.3 Test Facility

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

• **A2LA (Certificate No. 6336.01)**

SGS-CSTC Standards Technical Services (Suzhou) Co., Ltd. is accredited by the American Association for Laboratory Accreditation (A2LA).

• **FCC (Designation Number: CN1312)**

SGS-CSTC Standards Technical Services (Suzhou) Co., Ltd. has been recognized as an accredited testing laboratory.

Test Firm Registration Number: 717327

• **ISED (CAB Identifier: CN0120)**

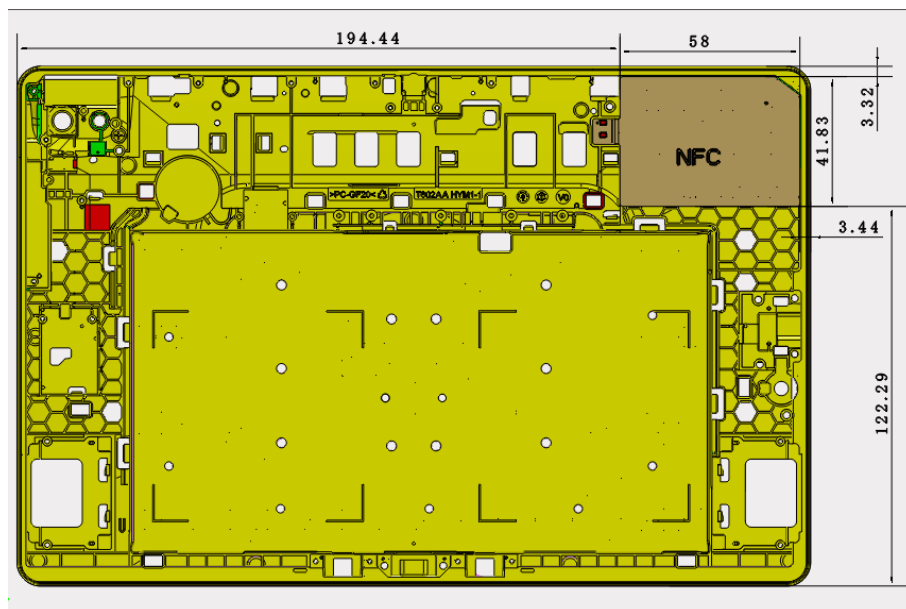
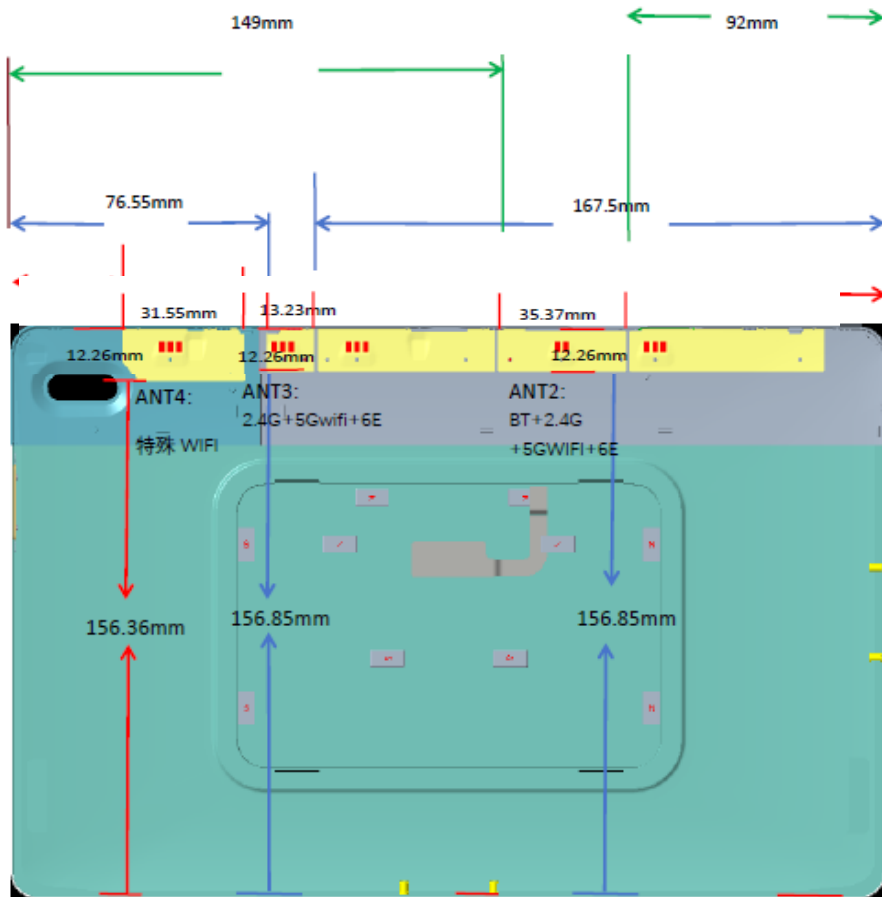
SGS-CSTC Standards Technical Services (Suzhou) Co., Ltd. has been recognized by Innovation, Science and Economic Development Canada (ISED) as an accredited testing laboratory.

Company Number: 27594

1.4 General Description of EUT

Device Type :	portable device		
Exposure Category:	uncontrolled environment / general population		
Antenna Type:	FPC Antenna		
Device Operating Configurations :			
Modulation Mode:	WIFI: DSSS, OFDM, OFDMA; BT: GFSK, $\pi/4$ DQPSK, 8DPSK NFC: ASK		
Device Class:	B		
Frequency Bands:	Band	Tx (MHz)	Rx (MHz)
	Wi-Fi 2.4G	2412 - 2462	2412 - 2462
	Wi-Fi 5G	5150 - 5250	5150 - 5250
		5250 - 5350	5250 - 5350
		5470 - 5725	5470 - 5725
		5725 - 5850	5725 - 5850
	Wi-Fi 6E	5925 - 6425	5925 - 6425
		6425 - 6525	6425 - 6525
		6525 - 6875	6525 - 6875
		6875 - 7125	6875 - 7125
	Bluetooth	2400 - 2483.5	2400 - 2483.5
	Hyper WIFI	903.5 – 926.5	903.5 – 926.5
	NFC	13.56MHz	13.56MHz
RF Cable:	☒ Provided by the applicant ☐ Provided by the laboratory		
Battery Information:	Model:	1ICP3/93/99-2	
	Normal Voltage:	3.87V	
	Rated capacity:	8000mAh	
	Manufacturer:	Guangdong Fenghua New Energy Co.,Ltd.	
Note: Since the above data and/or information is provided by the client relevant results or conclusions of this report are only made for these data and/or information, SGS is not responsible for the authenticity, integrity and results of the data and information and/or the validity of the conclusion. As above information is provided and confirmed by the applicant. SGS is not liable to the accuracy, suitability, reliability or/and integrity of the information.			

1.4.1 DUT Antenna Locations (Back View)





Ant	Band:
Ant2	WIFI2.4G,WIFI5G, WIFI6G Bluetooth
Ant3	WIFI2.4G,WIFI5G, WIFI6G
Ant4	Hyper WIFI
Ant5	NFC

Note:

- 1) The test device is a android tablet. The overall diagonal dimension of this device is 300.37 mm. Per KDB 648474 D04, because the diagonal distance of this device is $\geq 160\text{mm}$, so it is a phablet.

1.4.2 EUT side for SAR Testing

• Stand-alone SAR test evaluation

1) Per FCC KDB 447498D01, the 1-g and 10-g SAR test exclusion thresholds for 100 MHz to 6 GHz at test separation distances ≤ 50 mm are determined by:

$$[(\text{max. power of channel, including tune-up tolerance, mW})/(\text{min. test separation distance, mm})] \cdot [\sqrt{f(\text{GHz})}] \leq 3.0$$
 for 1-g SAR and ≤ 7.5 for 10-g extremity SAR, where:

- $f(\text{GHz})$ is the RF channel transmit frequency in GHz
- Power and distance are rounded to the nearest mW and mm before calculation
- The result is rounded to one decimal place for comparison

When the minimum test separation distance is < 5 mm, a distance of 5 mm is applied to determine SAR test exclusion.

2) At 100 MHz to 6 GHz and for test separation distances > 50 mm, the SAR test exclusion threshold is determined according to the following:

a) [Power allowed at numeric threshold for 50 mm in step 1) + (test separation distance - 50 mm) · ($f(\text{MHz})/150$)] mW, at 100 MHz to 1500 MHz

b) [Power allowed at numeric threshold for 50 mm in step 1) + (test separation distance - 50 mm) · 10] mW at > 1500 MHz and ≤ 6 GHz

Bnad	Exposure Condition	f (GHz)	Pmax (dBm)	Pmax (mw)	separation distance(cm)					Calculated Value					SAR Test (Yes or No)				
			Conducted	Conducted	Back side	Left side	Right side	Top side	Bottom side	Back side	Left side	Right side	Top side	Bottom side	Back side	Left side	Right side	Top side	Bottom side
WIFI 2.4G ANT2	Body 0mm	2.45	13.00	19.95	0.50	9.0	11.13	0.50	15.65	2.74	665.20	1003.59	2.74	1754.68	Yes	No	No	Yes	No
WIFI 5.2G ANT2	Body 0mm	5.20	16.00	39.81	0.50	9.0	11.13	0.50	15.65	1.50	583.46	911.93	1.50	1735.36	Yes	No	No	Yes	No
WIFI 5.3G ANT2	Body 0mm	5.30	16.00	39.81	0.50	9.0	11.13	0.50	15.65	1.48	581.53	909.72	1.48	1735.36	Yes	No	No	Yes	No
WIFI 5.5G ANT2	Body 0mm	5.50	16.00	39.81	0.50	9.0	11.13	0.50	15.65	1.44	577.79	905.44	1.44	1735.36	Yes	No	No	Yes	No
WIFI 5.8G ANT2	Body 0mm	5.80	16.00	39.81	0.50	9.0	11.13	0.50	15.65	1.38	572.47	899.34	1.38	1735.36	Yes	No	No	Yes	No
WIFI 6G ANT2	Body 0mm	5.80	16.00	39.81	0.50	9.0	11.13	0.50	15.65	1.38	572.47	899.34	1.38	1735.36	Yes	No	No	Yes	No
BT ANT2	Body 0mm	2.45	11.00	12.59	0.50	9.0	11.13	0.50	15.65	2.74	665.20	1003.59	2.74	1770.38	Yes	No	No	Yes	No
WIFI 2.4G ANT3	Body 0mm	2.45	13.00	19.95	0.50	7.7	16.75	0.50	15.69	2.74	492.45	2183.87	2.74	1764.86	Yes	No	No	Yes	No
WIFI 5.2G ANT3	Body 0mm	5.20	15.00	31.62	0.50	7.7	16.75	0.50	15.69	1.50	420.92	2121.49	1.50	1751.58	Yes	No	No	Yes	No
WIFI 5.3G ANT3	Body 0mm	5.30	15.00	31.62	0.50	7.7	16.75	0.50	15.69	1.48	419.25	2119.93	1.48	1751.58	Yes	No	No	Yes	No
WIFI 5.5G ANT3	Body 0mm	5.50	12.00	15.85	0.50	7.7	16.75	0.50	15.69	1.44	416.03	2116.91	1.44	1772.33	Yes	No	No	Yes	No
WIFI 5.8G ANT3	Body 0mm	5.80	17.00	50.12	0.50	7.7	16.75	0.50	15.69	1.38	411.45	2112.59	1.38	1740.05	Yes	No	No	Yes	No
WIFI 6G ANT3	Body 0mm	5.80	17.00	50.12	0.50	7.7	16.75	0.50	15.69	1.38	411.45	2112.59	1.38	1740.05	Yes	No	No	Yes	No
Hyper WIFI ANT4	Body 0mm	0.93	24.00	251.19	0.50	3.2	18.81	0.50	15.20	8.01	126.86	1723.56	8.01	1585.46	Yes	Yes	No	Yes	No

Table 1: Estimated SAR calculation for WiFi and BT

Note:

1) * - maximum possible output power declared by manufacturer

1.5 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	General RF Exposure Guidance v01
KDB 865664 D01	SAR Measurement 100 MHz to 6 GHz v01r04
KDB 865664 D02	RF Exposure Reporting v01r02
KDB 690783 D01	SAR Listings on Grants v01r03
KDB 616217 D04	SAR for laptop and tablets v01r02

1.6 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:

* 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.

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.)

1.6.1 Power reduction specification

This device uses a single fixed level of power reduction through static table look-up for SAR compliance and it is triggered by a single event or operation

- 1) A fixed level power reduction is applied for some frequency bands when simultaneously transmitting with the other antennas in certain simultaneous transmission conditions. The standalone SAR compliance still uses the standalone SAR results tested at the maximum output power level without any power reduction
- 2) The proximity sensor is used to indicate when the device is held close to a user's body exposure condition. It utilizes the proximity sensor to reduce the output power in specific wireless and operating modes of main antenna to ensure SAR compliance (Refer to section 5.4 for detailed proximity Sensor information and validation data per KDB 616217).

The detailed power reduction information can be referred to Appendix E.



2 Laboratory Environment

Temperature	Min. = 18°C, Max. = 25 °C
Relative humidity	Min. = 30%, Max. = 70%
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.	

Table 2: The Ambient Conditions

3 SAR Measurements System Configuration

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 $SAR = \sigma (|E|^2) / \rho$ where σ and ρ are the conductivity and mass density of the tissue-Simulate.

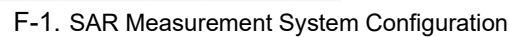
The DASY system for performing compliance tests consists of the following items:

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, 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 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.



- 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 7.
- DASY5 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.

3.2 Isotropic E-field Probe 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 μ W/g to > 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
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

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	

3.4 SAM Twin Phantom

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	approx. 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.

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	approx. 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.

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 $\epsilon=3$ and loss tangent $\delta=0.02$. The amount of dielectric material has been reduced in the closest vicinity of the device, since measurements have suggested that the influence of the clamp on the test results could thus be lowered.

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 ($f \leq 2\text{GHz}$), 30mm*30mm*30mm (f for 2-3GHz) and 24mm*24mm*22mm (f for 5-6GHz) was assessed by measuring 5x5x7 points ($f \leq 2\text{GHz}$), 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.

			$\leq 3 \text{ GHz}$	$> 3 \text{ GHz}$
Maximum distance from closest measurement point (geometric center of probe sensors) to phantom surface			$5 \pm 1 \text{ mm}$	$\frac{1}{2} \cdot \delta \cdot \ln(2) \pm 0.5 \text{ mm}$
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}			$\leq 2 \text{ GHz: } \leq 15 \text{ mm}$ $2 - 3 \text{ GHz: } \leq 12 \text{ mm}$	$3 - 4 \text{ GHz: } \leq 12 \text{ mm}$ $4 - 6 \text{ GHz: } \leq 10 \text{ mm}$
			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.	
Maximum zoom scan spatial resolution: Δx_{Zoom} , Δy_{Zoom}			$\leq 2 \text{ GHz: } \leq 8 \text{ mm}$ $2 - 3 \text{ GHz: } \leq 5 \text{ mm}^*$	$3 - 4 \text{ GHz: } \leq 5 \text{ mm}^*$ $4 - 6 \text{ GHz: } \leq 4 \text{ mm}^*$
Maximum zoom scan spatial resolution, normal to phantom surface	uniform grid: $\Delta z_{Zoom}(n)$		$\leq 5 \text{ mm}$	$3 - 4 \text{ GHz: } \leq 4 \text{ mm}$ $4 - 5 \text{ GHz: } \leq 3 \text{ mm}$ $5 - 6 \text{ GHz: } \leq 2 \text{ mm}$
	graded grid	$\Delta z_{Zoom}(1)$: between 1" two points closest to phantom surface	$\leq 4 \text{ mm}$	$3 - 4 \text{ GHz: } \leq 3 \text{ mm}$ $4 - 5 \text{ GHz: } \leq 2.5 \text{ mm}$ $5 - 6 \text{ GHz: } \leq 2 \text{ mm}$
		$\Delta z_{Zoom}(n>1)$: between subsequent points	$\leq 1.5 \cdot \Delta z_{Zoom}(n-1)$	
Minimum zoom scan volume	x, y, z		$\geq 30 \text{ mm}$	$3 - 4 \text{ GHz: } \geq 28 \text{ mm}$ $4 - 5 \text{ GHz: } \geq 25 \text{ mm}$ $5 - 6 \text{ GHz: } \geq 22 \text{ mm}$

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. $\pm 5 \%$

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 “.DAE4”. 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:

Probe parameters:	- Sensitivity	Normi, ai0, ai1, ai2
	- Conversion factor	ConvFi
	- Diode compression point	Dcpi
Device parameters:	- Frequency	f
	- Crest factor	cf
Media parameters:	- Conductivity	ε
	- Density	ρ

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 direct measuring mode of the multimeter option, the parameters of the actual system setup are used. In the scan visualization and export modes, the parameters stored in the corresponding document files are used.

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

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

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

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

U_i = input signal of channel i ($i = x, y, z$)

cf = crest factor of exciting field (DASY parameter)

dcpi = diode compression point (DASY parameter)

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

E-field probes:

$$E_i = (V_i / \text{Norm}_i \cdot \text{ConvF})^{1/2}$$

H-field probes:

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

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

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

[mV/(V/m)²] for E-field Probes

ConvF = sensitivity enhancement in solution

a_{ij} = sensor sensitivity factors for H-field probes

f = carrier frequency [GHz]

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

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

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

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

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

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

with SAR = local specific absorption rate in mW/g

E_{tot} = 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.

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

with P_{pwe} = equivalent power density of a plane wave in mW/cm²

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

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

4 SAR measurement variability and uncertainty

4.1 SAR measurement variability

Per KDB865664 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 tissue-equivalent medium used for the device measurements. The additional measurements are repeated after the completion of all measurements requiring the same head or body tissue-equivalent medium in a frequency band. The test device should be returned to ambient conditions (normal room temperature) with the battery fully charged before it is re-mounted on the device holder for the repeated measurement(s) to minimize any unexpected variations in the repeated results.

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

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

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.

5 PD measurement uncertainty

Declaration of Conformity:

The test results with all measurement uncertainty excluded is 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.

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

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

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

Uncertainty Distributions	Normal	Rectangular	Triangular	U-Shape
Multiplying Factor ^(a)	1/k ^(b)	1/√3	1/√6	1/√2

Standard Uncertainty for Assumed Distribution

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

(b) k is the coverage factor

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

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

Expanded uncertainty is a measure of uncertainty that defines an interval about the measurement result within which the measured value is confidently believed to lie. It is obtained by multiplying the combined standard uncertainty by a coverage factor. The judgment of conformity in the report is based on the measurement results excluding the measurement uncertainty.

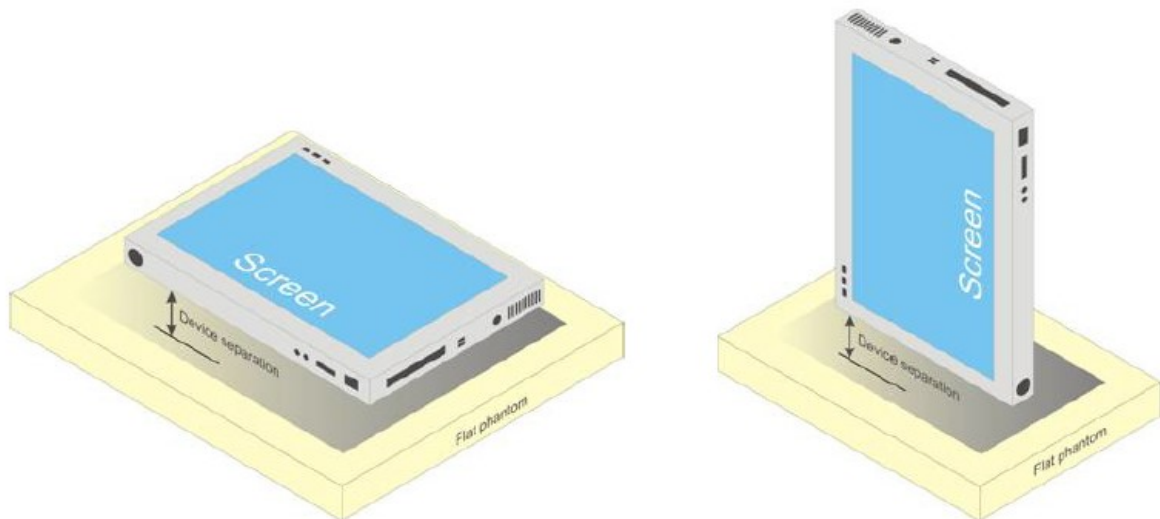
a	b	c	d	e	f=b*e/d	g
Error Description	Uncertainty Value (±dB)	Probability	Div.	Ci	Standard Uncertainty (±dB)	Vi (Veff)
Probe Calibration	0.49	N	1	1	0.49	∞
Probe correction	0.00	R	1.732	1	0.00	∞
Frequency response (BW ≤1 GHz)	0.20	R	1.732	1	0.12	∞
Sensor cross coupling	0.00	R	1.732	1	0.00	∞
Isotropy	0.50	R	1.732	1	0.29	∞
Linearity	0.20	R	1.732	1	0.12	∞
Probe scattering	0.00	R	1.732	1	0.00	∞
Probe positioning offset	0.30	R	1.732	1	0.17	∞
Probe positioning repeatability	0.04	R	1.732	1	0.02	∞
Sensor mechanical offset	0.00	R	1.732	1	0.00	∞
Probe spatial resolution	0.00	R	1.732	1	0.00	∞
Field impedance dependance	0.00	R	1.732	1	0.00	∞
Amplitude and phase drift	0.00	R	1.732	1	0.00	∞
Amplitude and phase noise	0.04	R	1.732	1	0.02	∞
Measurement area truncation	0.00	R	1.732	1	0.00	∞
Data acquisition	0.03	N	1	1	0.03	∞
Sampling	0.00	R	1.732	1	0.00	∞
Field reconstruction	2.00	R	1.732	1	1.15	∞
Forward transformation	0.00	R	1.732	1	0.00	∞
Power density scaling	0.00	R	1.732	1	0.00	∞
Spatial averaging	0.10	R	1.732	1	0.06	∞
System detection limit	0.04	R	1.732	1	0.02	∞
Probe coupling with DUT	0.00	R	1.732	1	0.00	∞
Modulation response	0.40	R	1.732	1	0.23	∞
Integration time	0.00	R	1.732	1	0.00	∞
Response time	0.00	R	1.732	1	0.00	∞
Device holder influence	0.10	R	1.732	1	0.06	∞
DUT alignment	0.00	R	1.732	1	0.00	∞
RF ambient conditions	0.04	R	1.732	1	0.02	∞
Ambient reflections	0.04	R	1.732	1	0.02	∞
Immunity / secondary reception	0.00	R	1.732	1	0.00	∞
Drift of the DUT		R	1.732	1	0.00	∞
Combined Std. Uncertainty					1.33	
Expanded STD Uncertainty (95%), K=2					2.67	

6 Description of Test Position

6.1 Exposure Condition

6.1.1 The Body Test Position

The overall diagonal dimension of the display section of a tablet is > 20 cm, Per FCC KDB 616217, the back surface and edges of the tablet should be tested for SAR compliance with the tablet touching the phantom. SAR evaluation for the front surface of tablet display screens is generally not necessary. 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 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.

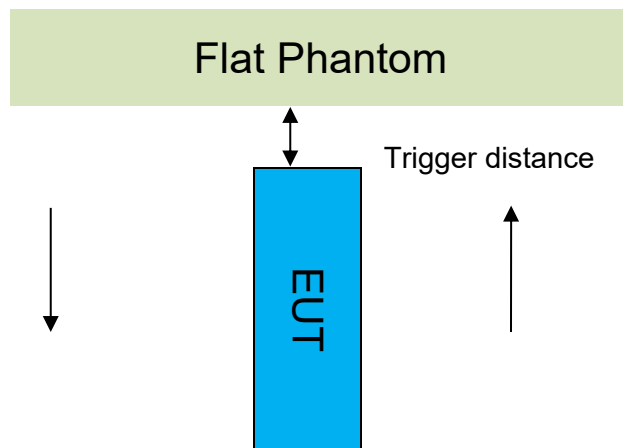


F-3. Tablet form factor portable computer.

6.2 Proximity Sensor Triggering Test

Proximity sensor triggering distances:

The Proximity sensor triggering was applied to WWAN antenna. Proximity sensor triggering distance testing was performed according to the procedures outlined in KDB 616217 D04 section 6.2, and EUT moving further away from the flat phantom and EUT moving toward the flat phantom were both assessed.



Proximity Sensor Triggering Distance(mm)		
An.2		
Position	Back side	Top side
Minimum	19	21
Required SAR Test	18	20
Ant.3		
Position	Back side	Top side
Minimum	25	26
Required SAR Test	24	25

Note:

SAR tests with proximity sensor power reduction are only required for the sides of frequency bands in the table above. For the other sides or other frequency bands of the device, SAR is still tested at the maximum power level with sensor off.

Proximity sensor coverage

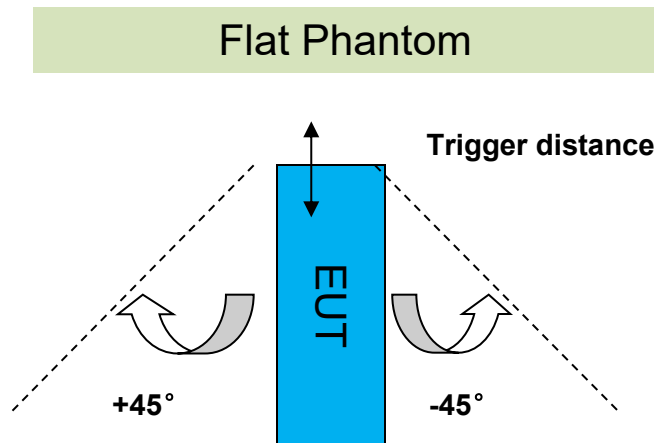
If a sensor is spatially offset from the antenna(s), it is necessary to verify sensor triggering for conditions where the antenna is next to the user but the sensor is laterally further away to ensure sensor coverage is sufficient for reducing the power to maintain compliance. For p-sensor coverage testing, the device is moved and “along the direction of maximum antenna and sensor offset”.

The proximity sensor and main antenna use same metallic electrode, so there is no spatial offset.

Device tilt angle influences to proximity sensor triggering

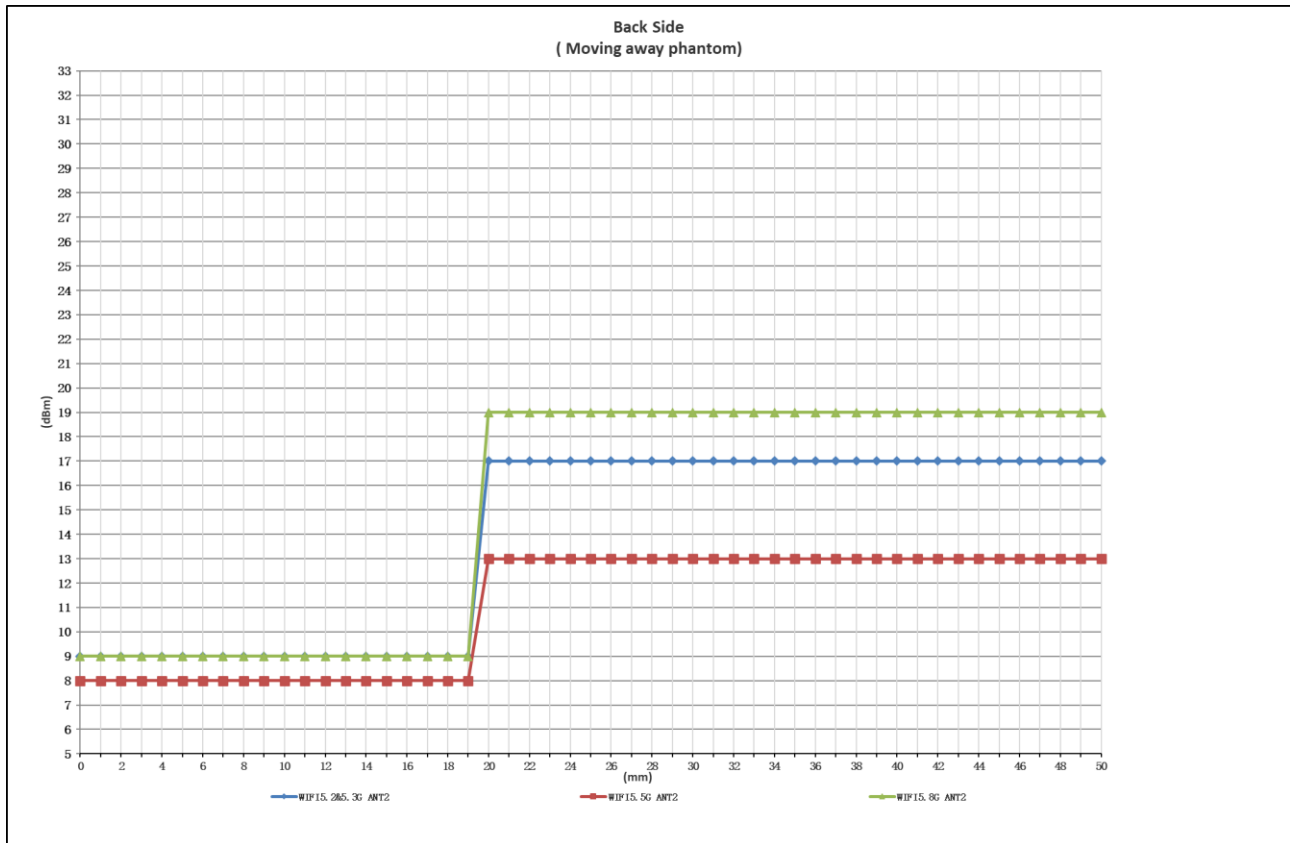
The influence of device tilt angles to proximity sensor triggering was determined by positioning each tablet edge that contains a transmitting antenna, perpendicular to the flat phantom.

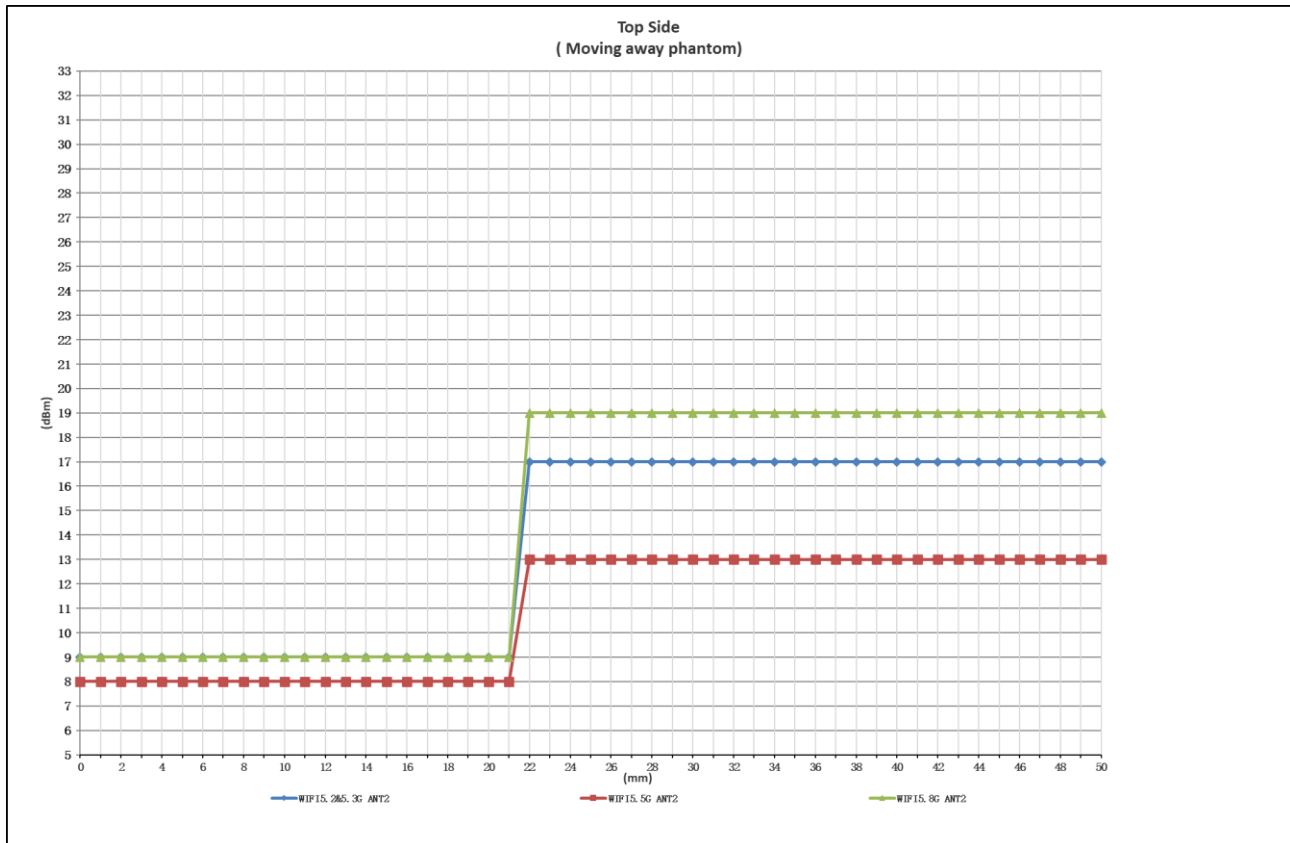
Rotating the tablet around the edge next to the phantom in $\leq 10^\circ$ increments until the tablet is $\pm 45^\circ$ from the vertical position at 0° , and the maximum output power remains in the reduced mode.



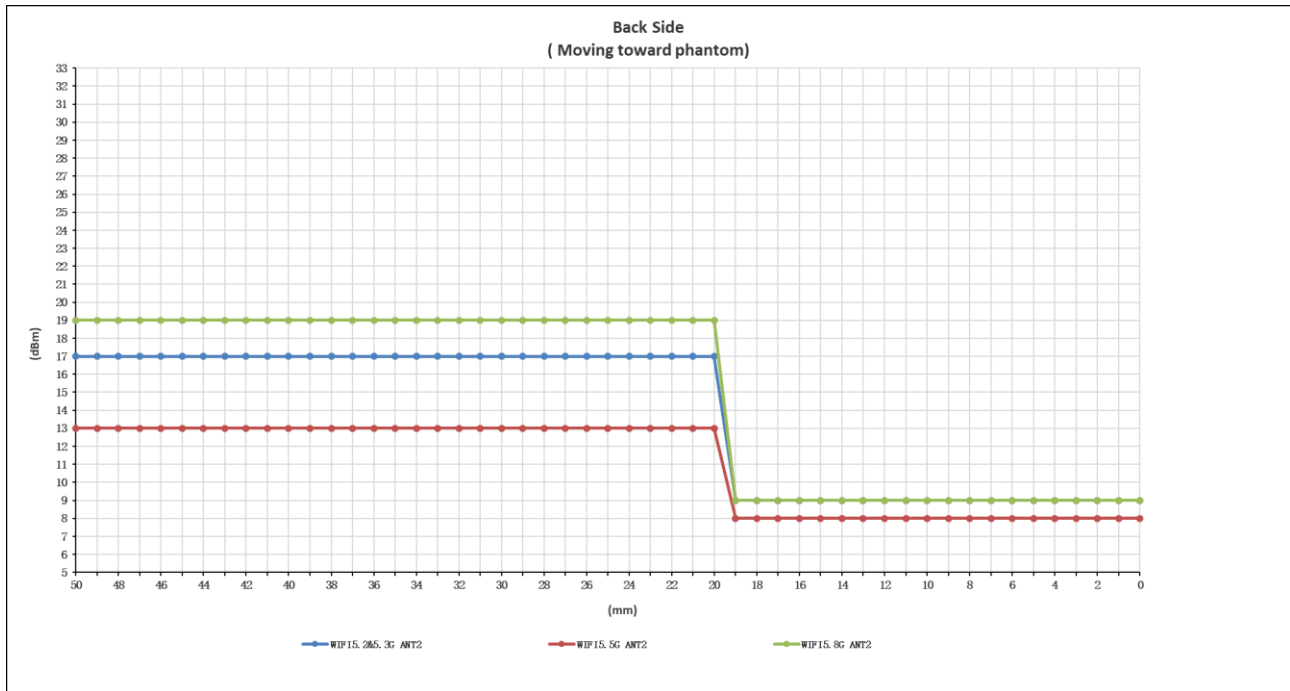
Summary of Tablet Tilt Angle Influence to Proximity Sensor Triggering for Top Side													
ANT	Minimum trigger distance Per KDB616217§6.2	Minimum trigger distance at which power reduction was maintained over $\pm 45^\circ$	Power Reduction Status										
			-45°	-35°	-25°	-15°	-5°	0°	5°	15°	25°	35°	45°
Ant 2	Top side:21mm	Top side:21mm	on	on	on	on	on	on	on	on	on	on	on
Ant 3	Top side:26mm	Top side:26mm	on	on	on	on	on	on	on	on	on	on	on

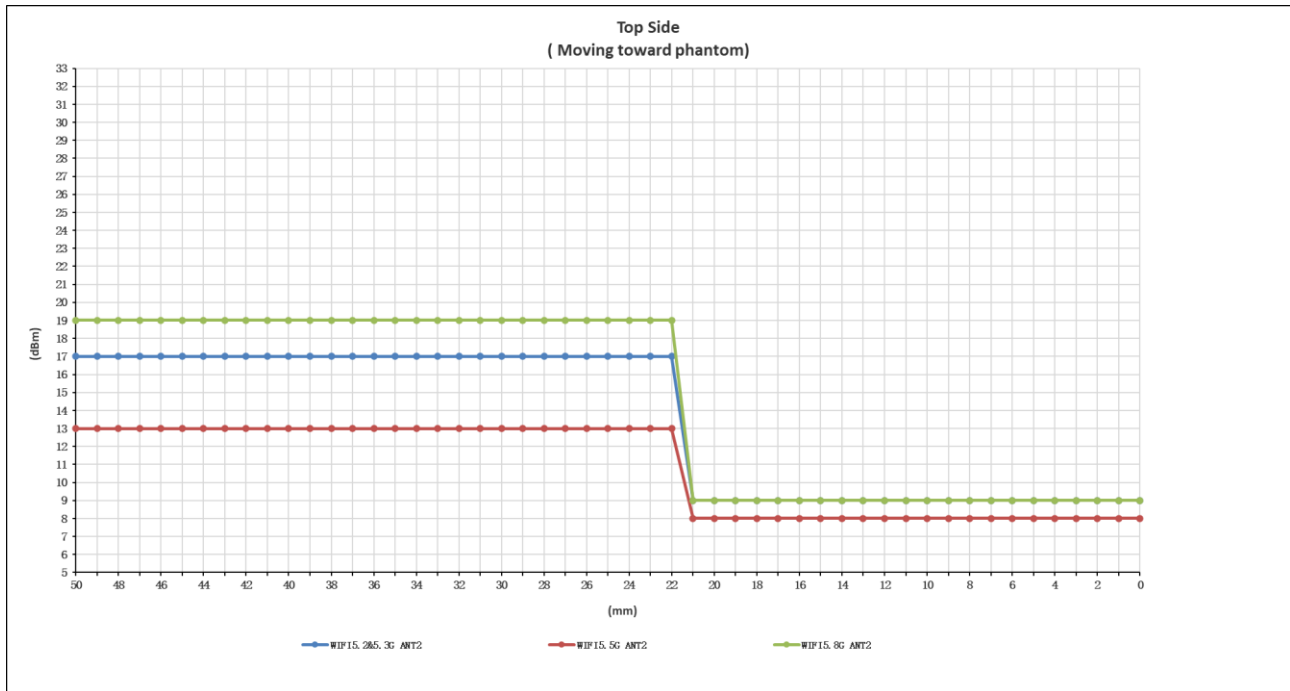
● Ant 2 DUT Moving Toward (Trigger)the Phantom





● Ant 2 DUT Moving Away (Release) from the Phantom





7 SAR System Verification Procedure

7.1 Tissue Simulate Liquid

7.1.1 Recipes for Tissue Simulate Liquid

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

Ingredients (% by weight)	Frequency (MHz)				
	450	700-900	1750-2000	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					
HSL13MHz is composed of the following ingredients: Water: 50-90% Non-ionic detergents: 5-50% NaCl: 0-2% Preservative: 0.03-0.1% HSL5GHz is composed of the following ingredients: Water: 50-65% Mineral oil: 10-30% Emulsifiers: 8-25% Sodium salt: 0-1.5%					

Table 3: Recipe of Tissue Simulate Liquid



Report No.: SUCR260300016509

Page: 36 of 54

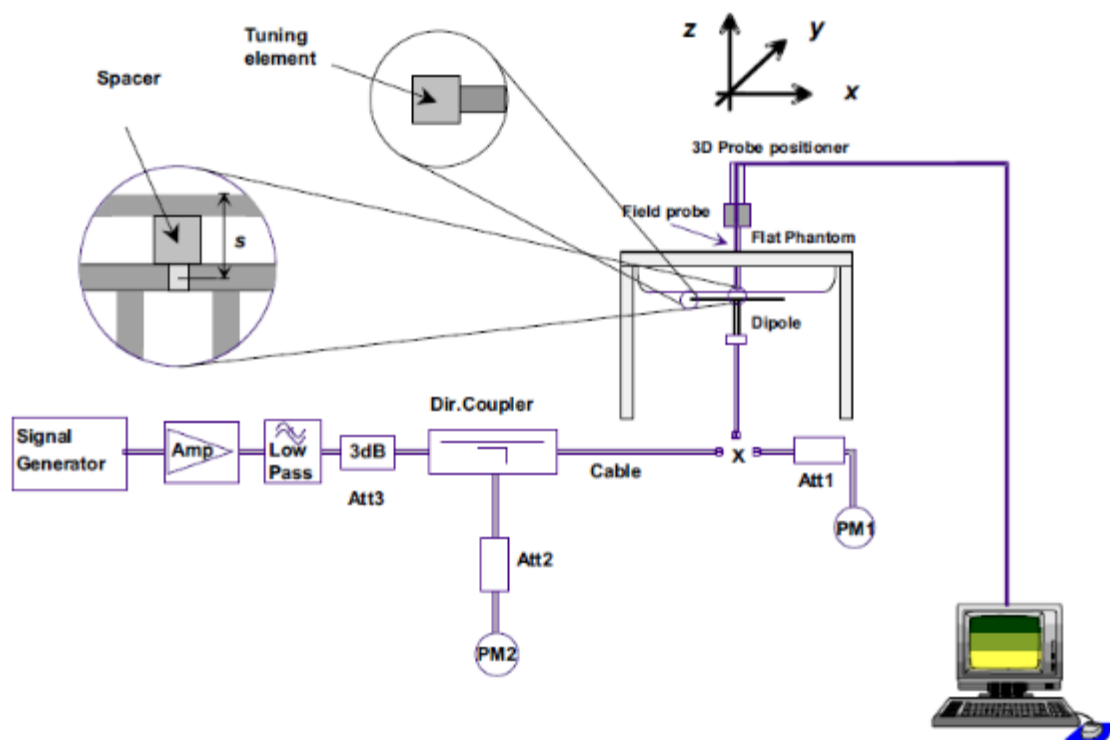
7.1.2 Measurement for Tissue Simulate Liquid

The Conductivity (σ) and Permittivity (ρ) are listed in bellow table. For the SAR measurement given in this report. The temperature variation of the Tissue Simulate Liquids was $22\pm 2^{\circ}\text{C}$.

The detailed test data see: **Reference report SUCR250200007209**

7.2 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 $\pm 10\%$ 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 $22\pm 2^{\circ}\text{C}$, the relative humidity was in the range 60% and the liquid depth above the ear reference points was above $15\pm 0.5\text{ cm}$ 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-4. the microwave circuit arrangement used for SAR system check

7.2.1 Justification for Extended SAR Dipole Calibrations

1) Referring to KDB865664 D01 requirements for dipole calibration, 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 10% 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.



Report No.: SUCR260300016509

Page: 39 of 54

7.2.2 Summary System Check Result(s)

The detailed test data see: **Reference report SUCR250200007209**

7.2.3 Detailed System Check Results

The detailed test data see: **Reference report SUCR250200007209**

8 PD System Verification Procedure

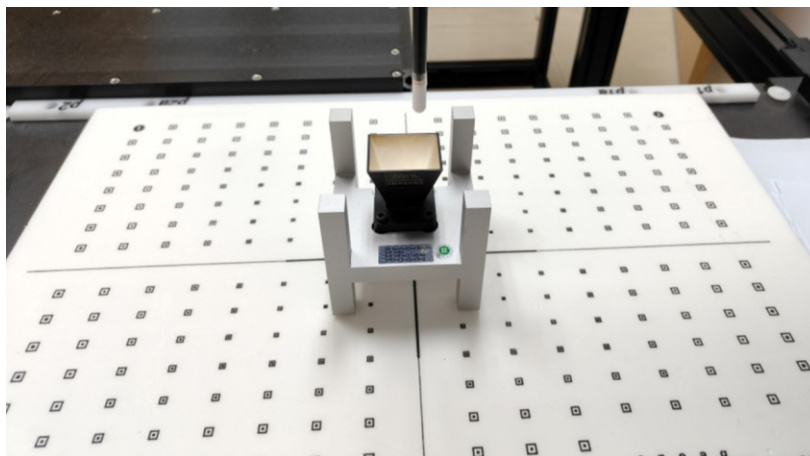
PD System Check Setting

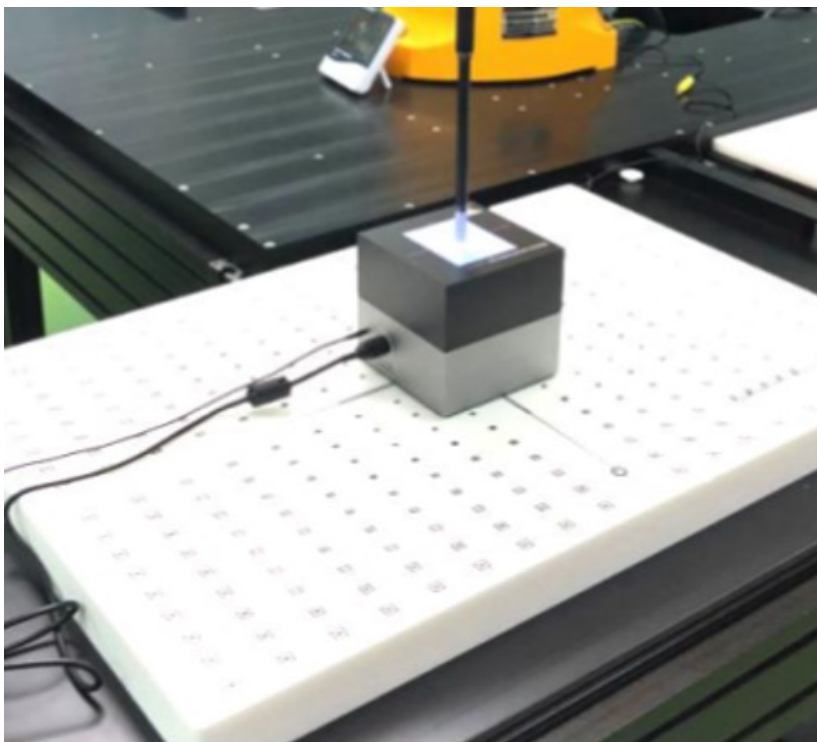
The system was verified to be within ± 0.66 dB of the power density targets on the calibration certificate according to the test system specification in the user's manual and calibration facility recommendation. The 0.66 dB deviation threshold represents the expanded uncertainty for system performance checks using SPEAG's mmWave verification sources. The same spatial resolution and measurement region used in the source calibration was applied during the system check.

The measured power density distribution of verification source was also confirmed through visual inspection to have no noticeable differences, both spatially (shape) and numerically (level) from the distribution provided by the manufacturer, per November 2017 TCBC Workshop Notes.

Settings for measurement of verification sources

Frequency [GHz]	Grid step	Grid extent X/Y [mm]	Measurement points
10	$0.25 \left(\frac{\lambda}{4}\right)$	120/120	16×16
30	$0.25 \left(\frac{\lambda}{4}\right)$	60/60	24×24
60	$0.25 \left(\frac{\lambda}{4}\right)$	32.5/32.5	26×26
90	$0.25 \left(\frac{\lambda}{4}\right)$	30/30	36×36





System Verification Setup Photo



Report No.: SUCR260300016509

Page: 42 of 54

PD System Check Results

The detailed test data see: **Reference report SZCR250200043801**

Detailed System Check Results

The detailed test data see: **Reference report SZCR250200043801**

9 Test Configuration

9.1 Operation Configurations

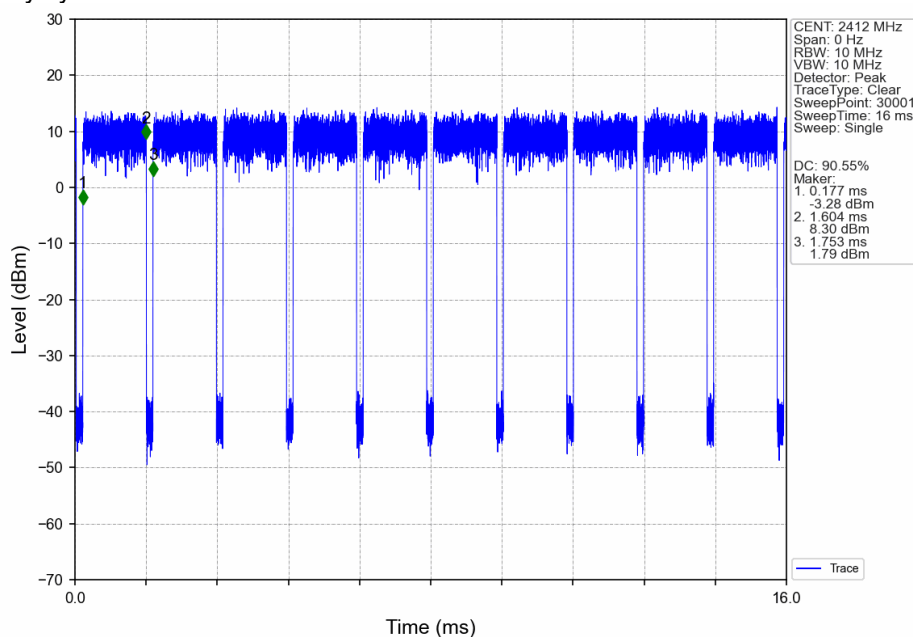
9.1.1 WiFi Test Configuration

A Wi-Fi device must be configured to transmit continuously at the required data rate, channel bandwidth and signal modulation, using the highest transmission duty factor supported by the test mode tools for SAR measurement.

9.1.2 Duty cycle

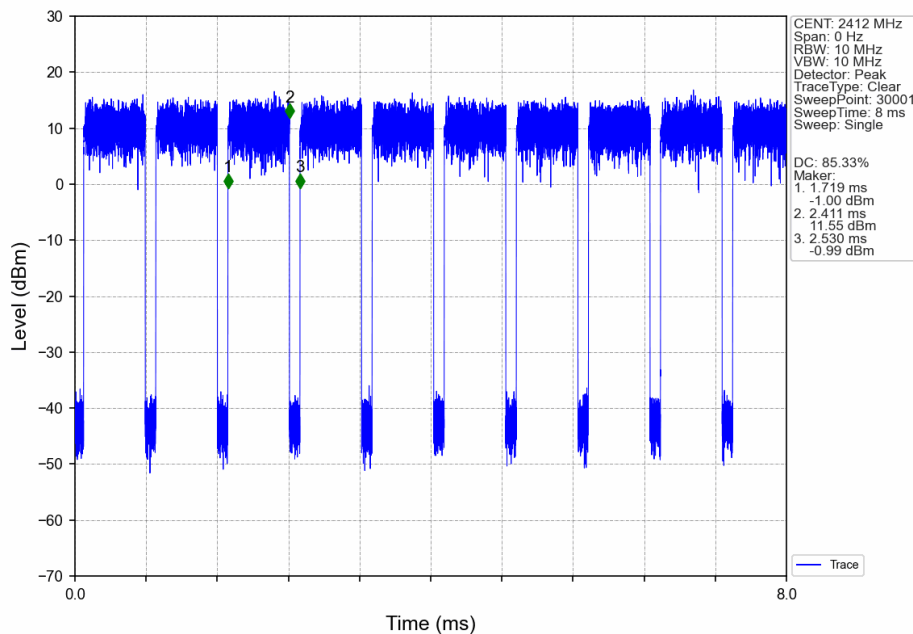
Wi-Fi 2.4GHz 802.11b (Ant2/3):

Duty cycle= 90.55%



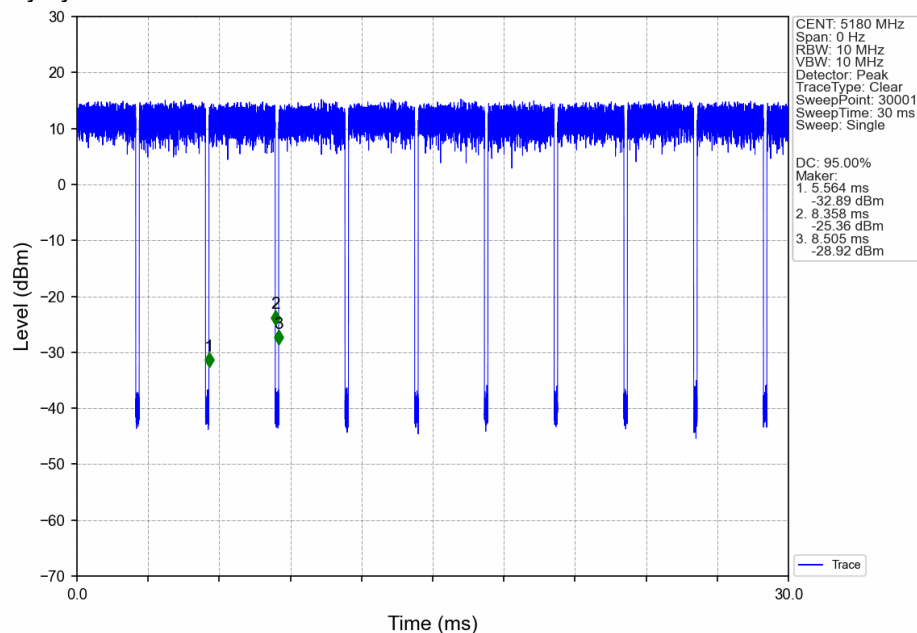
Wi-Fi 2.4GHz 802.11n (MIMO):

Duty cycle= 85.33%



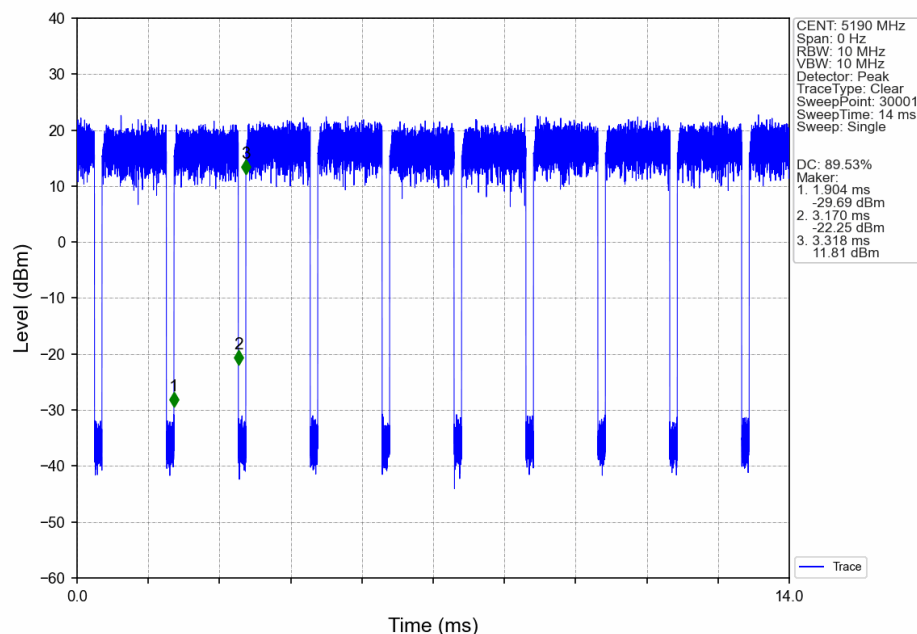
Wi-Fi 5GHz 802.11a (Ant2/3):

Duty cycle=95.00%

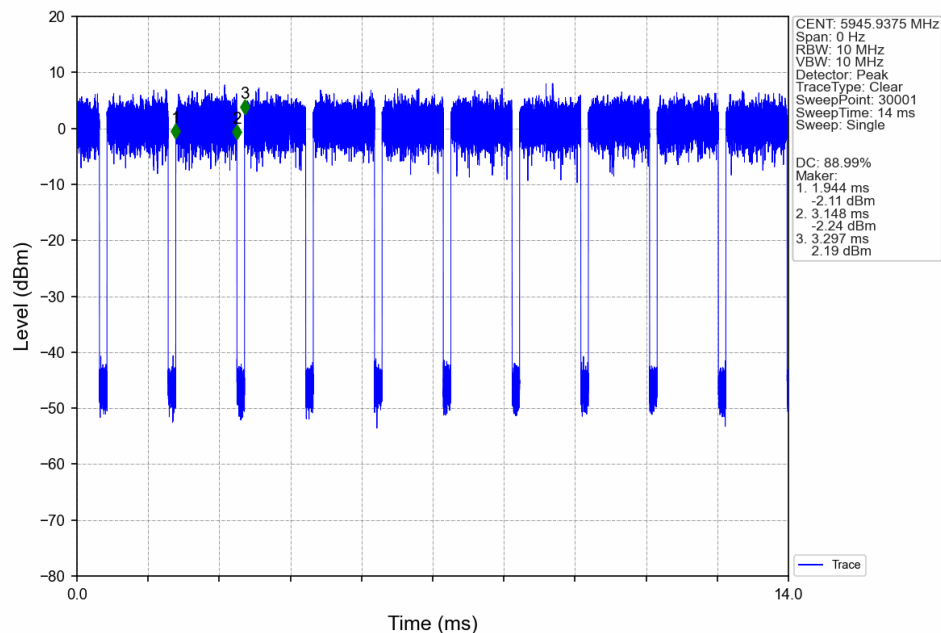


Wi-Fi 5GHz 802.11n 20 (MIMO):

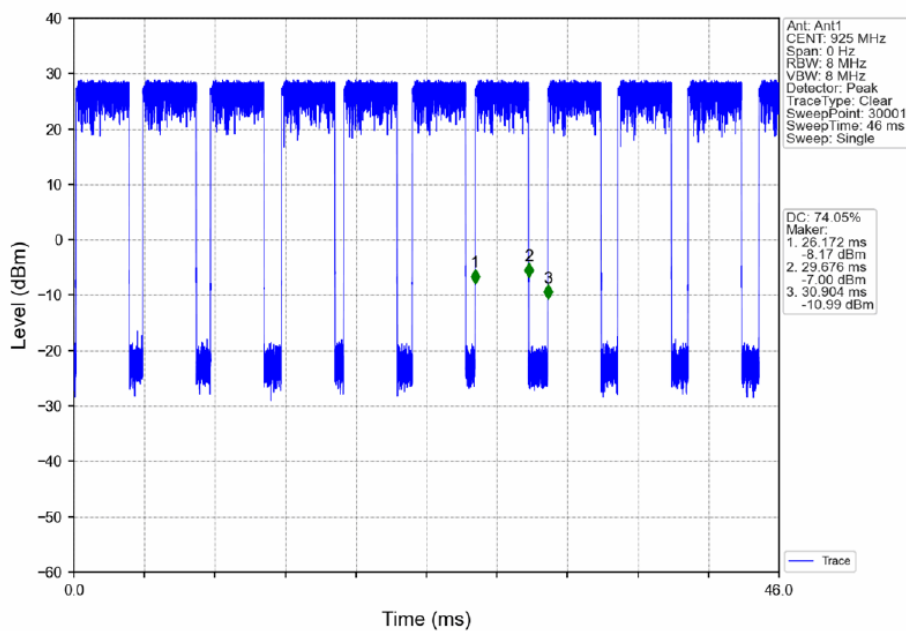
Duty cycle=89.53%



Wi-Fi 6GHz 802.11ax 80 (Ant3): Duty cycle=88.99%



Hyper WIFI 802.11ah-2M (Ant4): Duty cycle=74.05%



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 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.
 - a) 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 configurations according to the following:
 - a) replace “subsequent test configuration” with “next subsequent test configuration” (i.e., subsequent next highest specified maximum output power configuration)
 - b) replace “initial test configuration” with “all tested higher output power configurations”

9.1.2.4 2.4 GHz WiFi 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.
- 2) . 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.

- **SAR Test Requirements for OFDM configurations**

When SAR measurement is required for 802.11 g/n OFDM configurations, each standalone and frequency aggregated band is considered separately for SAR test reduction. In applying the initial test configuration and subsequent test configuration procedures, the 802.11 transmission configuration with the highest specified maximum output power and the channel within a test configuration with the highest measured maximum output power should be clearly distinguished to apply the procedures.

9.1.2.5 WiFi 5G SAR Test Procedures

9.1.2.5.1 U-NII-1 and U-NII-2A Bands

For devices that operate in only one of the U-NII-1 and U-NII-2A bands, the normally required SAR procedures for OFDM configurations are applied. For devices that operate in both U-NII bands using the same transmitter and antenna(s), SAR test reduction is determined according to the following:

- 1) When the same maximum output power is specified for both bands, begin SAR measurement in U-NII-2A band by applying the OFDM SAR requirements. If the highest *reported* SAR for a test configuration is ≤ 1.2 W/kg, SAR is not required for U-NII-1 band for that configuration (802.11 mode and exposure condition); otherwise, both bands are tested independently for SAR.
- 2) When different maximum output power is specified for the bands, begin SAR measurement in the band with higher specified maximum output power. The highest *reported* SAR for the tested configuration is adjusted by the ratio of lower to higher specified maximum output power for the two bands. When the adjusted SAR is ≤ 1.2 W/kg, SAR is not required for the band with lower maximum output power in that test configuration; otherwise, both bands are tested independently for SAR.
- 3) The two U-NII bands may be aggregated to support a 160 MHz channel on channel number 50. Without additional testing, the maximum output power for this is limited to the lower of the maximum output power certified for the two bands. When SAR measurement is required for at least one of the bands and the highest *reported* SAR adjusted by the ratio of specified maximum output power of aggregated to standalone band is > 1.2 W/kg, SAR is required for the 160 MHz channel. This procedure does not apply to an aggregated band with maximum output higher than the standalone band(s); the aggregated band must be tested independently for SAR. SAR is not required when the 160 MHz channel is operating at a reduced maximum power and also qualifies for SAR test exclusion.

9.1.2.5.2 U-NII-2C and U-NII-3 Bands

The frequency range covered by these bands is 380 MHz (5.47 – 5.85 GHz), which requires a minimum of at least two SAR probe calibration frequency points to support SAR measurements. When Terminal Doppler Weather Radar (TDWR) restriction applies, all channels that operate at 5.60 – 5.65 GHz must be included to apply the SAR test reduction and measurement procedures.

When the same transmitter and antenna(s) are used for U-NII-2C band and U-NII-3 band or 5.8 GHz band of §15.247, the bands may be aggregated to enable additional channels with 20, 40 or 80 MHz bandwidth to span across the band gap, as illustrated in Appendix B. The maximum output power for the additional band gap channels is limited to the lower of those certified for the bands. Unless band gap channels are permanently disabled, they must be considered for SAR testing. The frequency range covered by these bands is 380 MHz (5.47 – 5.85 GHz), which requires a minimum of at least two SAR probe calibration frequency points to support SAR measurements. To maintain SAR measurement accuracy and to facilitate test reduction, the channels in U-NII-2C band above 5.65 GHz may be grouped with the 5.8 GHz channels in U-NII-3 or §15.247 band to enable two SAR probe calibration frequency points to cover the bands, including the band gap channels. When band gap channels are supported and the bands are not aggregated for SAR testing, band gap channels must be considered independently in each band according to the normally required OFDM SAR measurement and probe calibration frequency points requirements.

9.1.2.5.3 OFDM Transmission Mode SAR Test Configuration and Channel Selection Requirements

The initial test configuration for 5 GHz OFDM transmission modes is determined by the 802.11 configuration with the highest maximum output power specified for production units, including tune-up tolerance, in each standalone and aggregated frequency band. SAR for the initial test configuration is measured using the highest maximum output power channel determined by the default power measurement procedures. When multiple configurations in a frequency band have the same specified maximum output power, the initial test configuration is determined according to the following steps applied sequentially.

- 1) The largest channel bandwidth configuration is selected among the multiple configurations with the same specified maximum output power.
- 2) If multiple configurations have the same specified maximum output power and largest channel bandwidth, the lowest order modulation among the largest channel bandwidth configurations is selected.
- 3) If multiple configurations have the same specified maximum output power, largest channel bandwidth and lowest order modulation, the lowest data rate configuration among these configurations is selected.
- 4) When multiple transmission modes (802.11a/g/n/ac) have the same specified maximum output power, largest channel bandwidth, lowest order modulation and lowest data rate, the lowest order 802.11 mode is selected; i.e., 802.11a is chosen over 802.11n then 802.11ac or 802.11g is chosen over 802.11n. After an initial test configuration is determined, if multiple test channels have the same measured maximum output power, the channel chosen for SAR measurement is determined according to the following. These channel selection procedures apply to both the initial test configuration and subsequent test configuration(s), with respect to the default power measurement procedures or additional power measurements required for further SAR test reduction. The same procedures also apply to subsequent highest output power channel(s) selection.
 - The channel closest to mid-band frequency is selected for SAR measurement.
 - For channels with equal separation from mid-band frequency; for example, high and low channels or two mid-band channels, the higher frequency (number) channel is selected for SAR measurement.

9.1.2.5.4 SAR Test Requirements for OFDM configurations

When SAR measurement is required for 802.11 a/n/ac OFDM configurations, each standalone and frequency aggregated band is considered separately for SAR test reduction. When the same transmitter and antenna(s) are used for U-NII-1 and U-NII-2A bands, additional SAR test reduction applies. When band gap channels between U-NII-2C band and 5.8 GHz U-NII-3 or §15.247 band are supported, the highest maximum output power transmission mode configuration and maximum output power channel across the bands must be used to determine SAR test reduction, according to the initial test configuration and subsequent test configuration requirements. In applying the initial test configuration and subsequent test configuration procedures, the 802.11 transmission configuration with the highest specified maximum output power and the channel within a test configuration with the highest measured maximum output power should be clearly distinguished to apply the procedures.

10 Test Result

10.1 Measurement of RF Conducted Power

The detailed test data see: **Reference report SUCR250200007209**

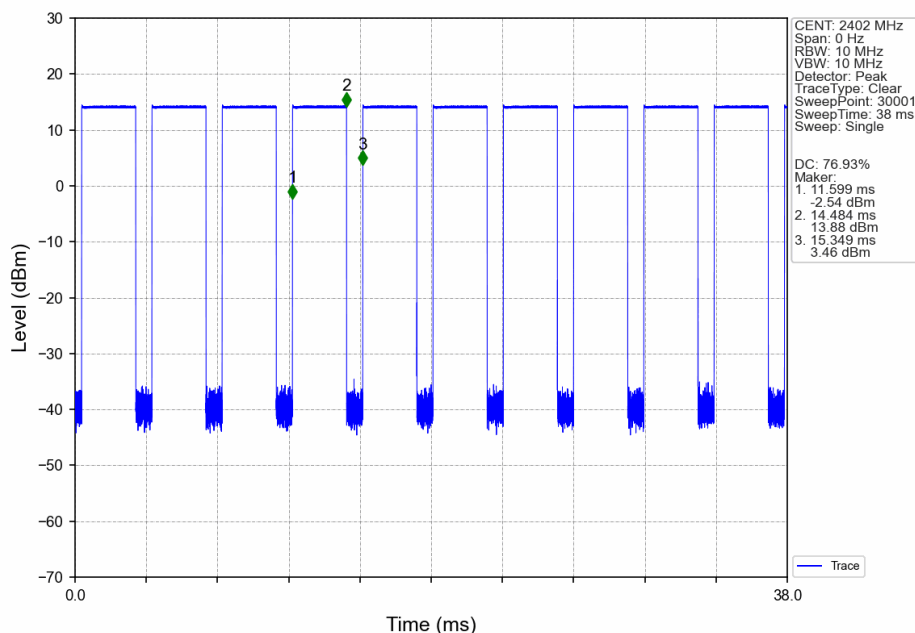
1) . For conducted power of WIFI must be measured at each transmit antenna port according to the DSSS and OFDM transmission configurations in each standalone and aggregated frequency band. For each transmission mode configuration, power must be measured for the highest and lowest channels; and at the mid-band channel(s) when there are at least 3 channels. For configurations with multiple mid-band channels, due to an even number of channels, both channels should be measured. Power measurement is required for the transmission mode configuration with the highest maximum output power specified for production units.

1) When the same highest maximum output power specification applies to multiple transmission modes, the largest channel bandwidth configuration with the lowest order modulation and lowest data rate is measured.

2) When the same highest maximum output power is specified for multiple largest channel bandwidth configurations with the same lowest order modulation or lowest order modulation and lowest data rate, power measurement is required for all equivalent 802.11 configurations with the same maximum output power.

2) . The conducted power of BT is measured with RMS detector.

BT DH5 Duty Cycle=76.93%





Report No.: SUCR260300016509

Page: 52 of 54

Measurement of PD Data

The detailed test data see: **Reference report SUCR250200007209**

Measurement of PD Data

The detailed test data see: **Reference report SZCR250200043801**

Multiple Transmitter Evaluation

10.1.1 Simultaneous SAR test evaluation

10.1.2 Simultaneous Transmission SAR Summation Scenario

The detailed test data see: **Reference report SUCR250200007209**

11 Equipment list

Test Platform		SPEAG DASY5 Professional				
		SPEAG DASY8 Professional				
Description		SAR Test System (Frequency range 10MHz-10GHz)				
Software Reference		DASY52 52.10.4(1527); SEMCAD X 14.6.14(7483)				
		Measurement Software: cDASY8 V16.2.0.1425				
Hardware Reference						
Equipment		Manufacturer	Model	Serial Number	Calibration Date	Due date of calibration
☒	Twin Phantom	SPEAG	ELI V8.0	2217	NCR	NCR
☒	Twin Phantom	SPEAG	SAM7	1702	NCR	NCR
☒	Twin Phantom	SPEAG	Twin-SAM V8.0	2155	NCR	NCR
☒	DAE	SPEAG	DAE4	1245	2024-06-05	2025-06-04
☒	DAE	SPEAG	DAE4ip	1826	2025-02-17	2026-02-16
☒	E-Field Probe	SPEAG	EX3DV4	7767	2024-12-31	2025-12-30
☒	E-Field Probe	SPEAG	EX3DV4	7735	2025-01-29	2026-01-28
☒	Validation Kits	SPEAG	CLA13	1032	2023-02-09	2026-02-08
☒	Validation Kits	SPEAG	D835V2	4d161	2023-08-25	2026-08-24
☒	Validation Kits	SPEAG	D2450V2	922	2023-08-28	2026-08-27
☒	Validation Kits	SPEAG	D5GHzV2	1174	2023-08-23	2026-08-22
☒	Validation Kits	SPEAG	D6.5GHzV2	1102	2023-09-11	2026-09-10
☒	Dielectric parameter probes	SPEAG	DAKS-3.5	1102	N/A	N/A
☒	RF Bi-Directional Coupler	Agilent	86205-60001	MY31400031	NCR	NCR
☒	Signal Generator	R&S	SMB100A	182393	2025-02-05	2026-02-04
☒	Preamplifier	Qiji	YX28980933	202104001	NCR	NCR
☒	Power Sensor	Keysight	U2002H	121251	2024-09-13	2025-09-12
☒	Attenuator	SHX	TS2-3dB	30704	NCR	NCR
☒	Coaxial low pass filter	Mini-Circuits	VLF-2500(+)	NA	NCR	NCR
☒	Coaxial low pass filter	Microlab Fxr	LA-F13	NA	NCR	NCR
☒	DC POWER SUPPLY	SAKO	SK1730SL5A	NA	NCR	NCR
☒	Speed reading thermometer	LKM	DTM3000	NA	2024-09-14	2025-09-13
☒	Humidity and Temperature Indicator	MingGao	MingGao	NA	2024-09-16	2025-09-15

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



Report No.: SUCR260300016509

Page: 54 of 54

12 Calibration certificate

The detailed test data see: **Reference report SUCR250200007209& SZCR250200043801**

13 Photographs

The detailed test data see: **Reference report SUCR250200007209& SZCR250200043801**

--- End of report ---