TEST REPORT

APPLICANT	:	Shenzhen Xhorse Electronics Co., Ltd.
PRODUCT NAME	:	KEY TOOL PLUS
MODEL NAME	:	XDKP00
BRAND NAME	:	Xhorse
FCC ID	:	2AI4T-XDKP00
STANDARD(S)	:	FCC 47CFR Part 2(2.1093) IEEE 1528-2013
RECEIPT DATE	:	2021-01-29
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Changed History		
Version	**Date**	**Reason for change**
1.0	2021-07-15	First edition

1. SAR Results Summary

The maximum results of Specific Absorption Rate (SAR) found during test as bellows:
<Highest Reported SAR Summary>

Frequency Band		Highest SAR Summary
		Body (Separation 0mm)
		1g SAR (W/kg)
WLAN	2.4GHz WLAN	0.883
	5GHz WLAN	1.007
2.4GHz Band	Bluetooth (Estimated)	0.478

Max Scaled SAR_{1g} (W/Kg):	Body:	1.007 W/kg	Limit(W/kg): 1.6 W/kg

Note:

1. This device is compliance with Specific Absorption Rate (SAR) for general population or uncontrolled exposure limits (1.6 W/kg) specified in FCC 47 CFR part 2 (2.1093) and ANSI/IEEE C95.1-2005, and had been tested in accordance with the measurement methods and procedures specified in IEEE 1528-2013.
2. When the test result is a critical value, we will use the measurement uncertainty give the judgment result based on the 95% risk level.

2. Technical Information

Note: Provide by applicant.

2.1. Applicant and Manufacturer Information

Applicant:	Shenzhen Xhorse Electronics Co., Ltd.
Applicant Address:	Floor 28, Block A, Building NO.6, international innovation Valley, Nanshan District, Shenzhen, China
Manufacturer:	Shenzhen Xhorse Electronics Co., Ltd.
Manufacturer Address:	Floor 28, Block A, Building NO.6, international innovation Valley, Nanshan District, Shenzhen, China

2.2. Equipment Under Test (EUT) Description

Product Name:	KEY TOOL PLUS
Serial No.:	(N/A, marked #3 by test site)
Hardware Version:	v1.2.6
Software Version:	v1.2.0
Frequency Bands:	WLAN 2.4GHz: 2412 MHz ~ 2462 MHz WLAN 5.2GHz: 5180 MHz ~ 5240 MHz WLAN 5.8GHz: 5745 MHz ~ 5825 MHz Bluetooth: 2402 MHz ~ 2480 MHz NFC: 13.56MHz 125KHz
Modulation Mode:	802.11b: DSSS 802.11g/n-HT20/40: OFDM 802.11a/ac-VHT20/40/80: OFDM Bluetooth BR+EDR: GFSK, π/4-DQPSK, 8-DPSK Bluetooth LE: GFSK NFC: ASK 125KHz: ASK, FSK
Antenna Type:	WLAM: FPC Antenna Bluetooth: FPC Antenna NFC: Loop Antenna 125KHz: Loop Antenna

Note: For a more detailed description, please refer to specification or user manual supplied by the applicant and/or manufacturer.

2.3. Environment of Test Site/Conditions

Normal Temperature (NT):	20 - 25 °C
Relative Humidity:	30 - 75 %
Air Pressure:	980 - 1020 hPa

Test Frequency:	WLAN 2.4GHz WLAN 5GHz
Operation Mode:	Call established
Power Level:	WLAN 2.4GHz (Power setting=13) WLAN 5.2GHz (Power setting=17) WLAN 5.8GHz (Power setting=18)

During SAR test, EUT is in Traffic Mode (Channel Allocated) at Normal Voltage Condition.
A communication link is set up with a System Simulator (SS) by air link, and a call is established.

3. Specific Absorption Rate (SAR)

3.1. 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 Middle than the limits for general population/uncontrolled.

3.2. 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:

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

SAR is expressed in units of Watts per kilogram (W/kg).
SAR measurement can be either related to the temperature elevation in tissue by,

$$\mathbf{SAR} = \mathbf{C}\left(\frac{\boldsymbol{\delta}\mathbf{T}}{\boldsymbol{\delta}\mathbf{t}}\right)$$

Where C is the specific head capacity, δT is the temperature rise and δt the exposure duration, or related to the electrical field in the tissue by

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

Where σ is the conductivity of the tissue, ρ is the mass density of the tissue and $|E|$ is the rmselectrical field strength.

However for evaluating SAR of low power transmitter, electrical field measurement is typically applied.

4. RF Exposure Limits

4.1. 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.

4.2. 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 General Population/Uncontrolled Exposure (W/kg)

Type Exposure	Uncontrolled Environment Limit
Spatial Peak SAR (1g cube tissue for head and trunk)	1.60 W/kg
Spatial Peak SAR (10g cube tissue for limbs)	4.00 W/kg
Spatial Peak SAR (1g cube tissue for whole body)	0.08 W/kg

Note:

1. Occupational/Uncontrolled Environments are defined as locations where there is exposure that may be incurred by people who are aware of the potential for exposure (i.e. as a result of employment or occupation).
2. 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.

5. Applied Reference Documents

Leading reference documents for testing:

Identity	Document Title	Method Determination /Remark
FCC 47CFR Part 2(2.1093)	Radio Frequency Radiation Exposure Evaluation: Portable Devices	No deviation
IEEE 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	No deviation
KDB 447498 D01v06	General RF Exposure Guidance	No deviation
KDB 248227 D01v02r02	SAR Measurement Procedures for 802.11 Transmitters	No deviation
KDB 616217 D04 v01r01	SAR Evaluation Considerations for Laptop, Notebook, Netbook and Tablet Computers	No deviation
KDB 865664 D01v01r04	SAR Measurement 100 MHz to 6 GHz	No deviation
KDB 865664 D02v01r02	RF Exposure Reporting	No deviation

Note 1: The test item is not applicable.
Note 2: Additions to, deviation, or exclusions from the method shall be judged in the "method determination" column of add, deviate or exclude from the specific method shall be explained in the "Remark" of the above table.

6. SAR Measurement System

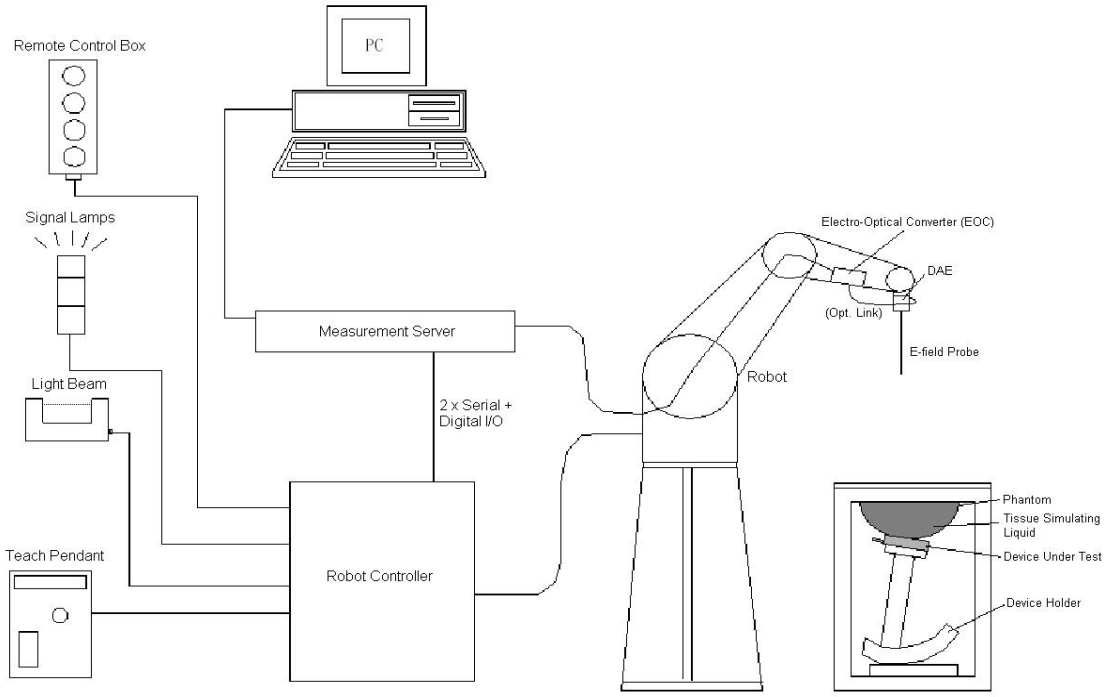


Fig 6.1 SPEAG DASY System Configurations

The DASY system for performance compliance tests is illustrated above graphically. This system consists of the following items:

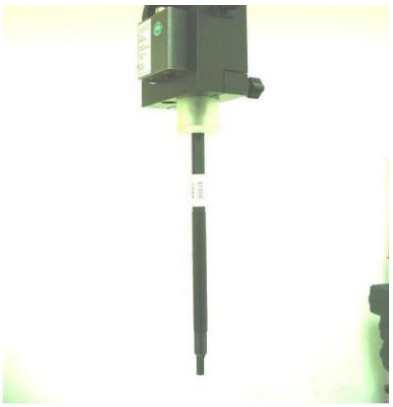
- A standard high precision 6-axis robot with controller, a teach pendant and software.
- A data acquisition electronic (DAE) attached to the robot arm extension.
- A dosimetric probe equipped with an optical surface detector system.
- The electro-optical converter (ECO) performs the conversion between optical and electrical signals.
- A measurement server performs the time critical tasks such as signal filtering, control of the robot operation and fast movement interrupts.
- A probe alignment unit which improves the accuracy of the probe positioning.
- A computer operating Windows XP.
- DASY software.
- Remove control with teach pendant and additional circuitry for robot safety such as warming lamps, etc.
- The SAM twin phantom.
- A device holder.
- Tissue simulating liquid.
- Dipole for evaluating the proper functioning of the system.
- Some of the components are described in details in the following sub-sections.

6.1. E-Field Probe

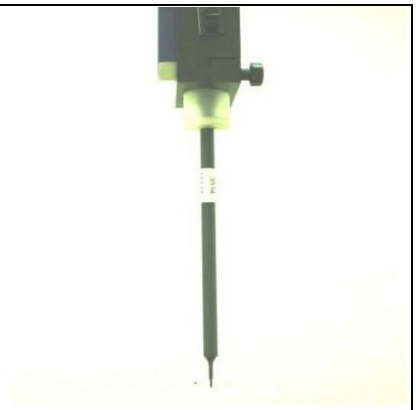
The SAR measurement is conducted with the dosimetric probe (manufactured by SPEAG).The probe is specially designed and calibrated for use in liquid with high permittivity. The dosimetric probe has special calibration in liquid at different frequency. This probe has a built in optical surface detection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

E-Field Probe Specification

<ES3DV3 Probe>

Construction	Symmetrical design with triangular core Built-in optical fiber for surface detection system. Built-in shielding against static charges. PEEK enclosure material (resistant to organic solvents, e.g., DGBE)	 **Fig 6.2 Photo of ES3DV3**
Frequency	10 MHz to 3 GHz; Linearity: ± 0.2 dB	
Directivity	± 0.2 dB in HSL (rotation around probe axis) ± 0.4 dB in HSL (rotation normal to probe axis)	
Dynamic Range	5 μW/g to 100 mW/g; Linearity: ± 0.2 dB	
Dimensions	Overall length: 330 mm (Tip: 16 mm) Tip diameter: 6.8 mm (Body: 12 mm) Distance from probe tip to dipole centers: 2.7 mm	

<EX3DV4 Probe>

Construction	Symmetrical design with triangular core Built-in shielding against static charges PEEK enclosure material (resistant to organic solvents, e.g., DGBE)	 **Fig 6.3 Photo of EX3DV4**
Frequency	10 MHz to 6 GHz; Linearity: ± 0.2 dB	
Directivity	± 0.3 dB in HSL (rotation around probe axis) ± 0.5 dB in tissue material (rotation normal to probe axis)	
Dynamic Range	10 μW/g to 100 mW/g; Linearity: ± 0.2 dB	
Dimensions	Overall length: 330 mm (Tip: 20 mm) Tip diameter: 2.5 mm (Body: 12 mm) Typical distance from probe tip to dipole centers: 1 mm	

E-Field Probe Calibration

Each probe needs to be calibrated according to a dosimetric assessment procedure with accuracy better than ± 10%. The spherical isotropy shall be evaluated and within ± 0.25 dB. The sensitivity parameters (NormX, NormY, and NormZ), the diode compression parameter (DCP) and the conversion factor (ConvF) of the probe are tested. The calibration data can be referred to appendix C of this report.

6.2. 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 fast16 bit AD-converter and a command decoder and control logic unit. 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 200MOhm; the inputs are symmetrical and floating. Common mode rejection is above 80 dB.

Fig 6.4 Photo of DAE

6.3. Robot

The SPEAG DASY system uses the high precision robots (DASY4: RX90BL; DASY5: TX90XL) type from Stäubli SA (France). For the 6-axis controller system, the robot controller version (DASY4: CS7MB; DASY5: CS8c) from Stäubli is used. The Stäubli robot series have many features that are important for our application:
High precision (repeatability ±0.035 mm)
High reliability (industrial design)
Jerk-free straight movements
Low ELF interference (the closed metallic construction shields against motor control fields)

Fig 6.5 Photo of DASY5

6.4. Measurement Server

The measurement server is based on a PC/104 CPU board with CPU (DASY4: 166 MHz, Intel Pentium; DASY5: 400 MHz, Intel Celeron), chip disk (DASY4: 32 MB; DASY5: 128 MB), RAM (DASY4: 64 MB, DASY5: 128 MB). The necessary circuits for communication with the DAE electronic box, as well as the 16 bit AD converter system for optical detection and digital I/O interface are contained on the DASY I/O board, which is directly connected to the PC/104 bus of the CPU board.

The measurement server performs all the real-time data evaluation for field measurements and surface detection, controls robot movements and handles safety operations.

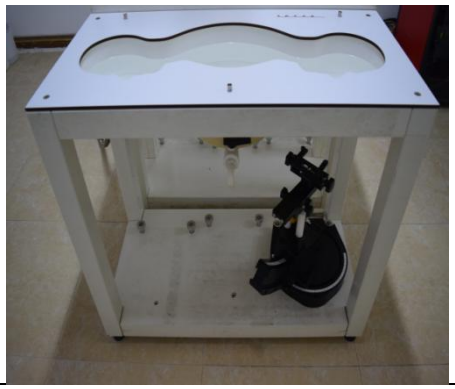
Fig 6.6 Photo of Server for DASY5

6.5. Light Beam Unit

The light beam switch allows automatic "tooling" of the probe. During the process, the actual position of the probe tip with respect to the robot arm is measured, as well as the probe length and the horizontal probe offset. The software then corrects all movements, such that the robot coordinates are valid for the probe tip. The repeatability of this process is better than 0.1 mm. If a position has been taught with an aligned probe, the same position will be reached with another aligned probe within 0.1 mm, even if the other probe has different dimensions. During probe rotations, the probe tip will keep its actual position.	 **Fig. 6.7 Photo of Light Beam**

6.6. Phantom

<SAM Twin Phantom>

Shell Thickness	2 ± 0.2 mm (sagging: <1%) 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	**Fig 6.8 Photo of SAM 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.

6.7. Device Holder

<Device Holder for SAM Twin Phantom>

The SAR in the phantom is approximately inversely proportional to the square of the distance between the source and the liquid surface. For a source at 5 mm distance, a positioning uncertainty of ± 0.5 mm would produce a SAR uncertainty of ± 20 %. Accurate device positioning is therefore crucial for accurate and repeatable measurements. The positions in which the devices must be measured are defined by the standards.

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 center for both scales is the ear reference point (EPR). Thus the device needs no repositioning when changing the angles.

The DASY device holder is constructed of low-loss POM material having the following dielectric parameters: relative permittivity ε = 3 and loss tangent δ = 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.

<Laptop Extension Kit>

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.

Fig 6.9 Device Holder

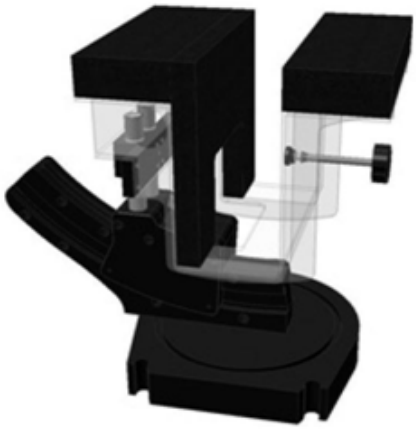


Fig 6.10 Laptop Extension Kit

6.8. Data Storage and Evaluation

Data Storage

The DASY software stores the assessed data from the data acquisition electronics as raw data (in microvolt readings from the probe sensors), together with all the necessary software parameters for the data evaluation (probe calibration data, liquid parameters and device frequency and modulation data) in measurement files. The post-processing 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 erroneous parameter settings. For example, if a measurement has been performed with an incorrect crest factor parameter in the device setup, the parameter can be corrected afterwards and the data can be reevaluated.

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

Data Evaluation

The DASY post-processing software (SEMCAD) 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	$Norm_i$, a_{i0}, a_{i1}, a_{i2}
	- Conversion factor	$ConvF_i$
	- Diode compression point	dcpi
Device parameters:	- Frequency	f
	- Crest factor	cf
Media parameters:	- Conductivity	σ
	- 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 multi-meter 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:

$$V_i = U_i + U_i^2 \times \frac{cf}{dcp_i}$$

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

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

E-field Probes: $E_i = \sqrt{\frac{V_i}{Norm_i \times ConvF}}$

H-field Probes: $H_i = \sqrt{V_i} \times \frac{a_{i0}+a_{i1}+a_{i2}f^2}{f}$

With V_i = compensated signal of channel i, (i = x, y, z)
$Norm_i$ = sensor sensitivity of channel i, (i = x, y, z), μV/(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):

$$E_{tot} = \sqrt{E_x^2 + E_y^2 + E_z^2}$$

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

$$SAR = E_{tot}^2 \times \frac{\sigma}{\rho \times 1000}$$

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]
ρ = equivalent tissue density in g/cm^3

Note that the density is set to 1, to account for actual head tissue density rather than the density of the tissue simulating liquid.

6.9. Test Equipment List

Manufacturer	Name of Equipment	Type/Model	Serial Number	Calibration	
				Last Cal.	Due Date
SPEAG	2450MHz System Validation Kit	D2450V2	805	2018.10.26	2021.10.25
SPEAG	5000MHz System Validation Kit	D5GHzV2	1176	2018.11.06	2021.11.05
SPEAG	Dosimetric E-Field Probe	EX3DV4	3823	2021.01.22	2022.01.21
SPEAG	Data Acquisition Electronics	DAE4	480	2020.06.02	2021.06.01
SPEAG	Dielectric Assessment KIT	DAK-3.5	1279	2020.10.20	2021.10.19
SPEAG	DASY System	TX90 XL	52.10.4.1527	NCR	NCR
SPEAG	SAM Twin Phantom 2	QD 000 P40 CB	TP-1464	NCR	NCR
SPEAG	Phone Positioner	N/A	N/A	NCR	NCR
R&S	Network Emulator	CMW500	165755	2021.02.25	2022.02.24
Agilent	Network Analyzer	E5071B	MY42404762	2021.03.29	2022.03.28
mini-circuits	Amplifier	ZHL-42W+	608501717	NCR	NCR
mini-circuits	Amplifier	ZVE-8G+	754401735	NCR	NCR
Agilent	Signal Generator	N5182B	MY53050509	2021.03.25	2022.03.24
Agilent	Power Senor	N8482A	MY41090849	2020.10.19	2021.10.18
Agilent	Power Meter	E4416A	MY45102093	2020.10.19	2021.10.18
Anritsu	Power Sensor	MA2411B	N/A	2020.10.19	2021.10.18
Anritsu	Power Meter	NRVD	101066	2020.10.19	2021.10.18
Agilent	Dual Directional Coupler	778D	50422	NA	NA
MCL	Attenuation1	351-218-010	N/A	NA	NA
KTJ	Thermo meter	TA298	N/A	2021.01.15	2022.01.14
N/A	Tissue Simulating Liquids	700-6000MHz	N/A	24H	

Note:

1. The calibration certificate of DASY can be referred to appendix E of this report.
2. The Insertion Loss calibration of Dual Directional Coupler and Attenuator were characterized via the network analyzer and compensated during system check.
3. The dielectric probe kit was calibrated via the network analyzer, with the specified procedure (calibrated in pure water) and calibration kit (standard) short circuit, before the dielectric measurement. The specific procedure and calibration kit are provided by Speag.
4. In system check we need to monitor the level on the power meter, and adjust the power amplifier level to have precise power level to the dipole; the measured SAR will be normalized to 1W input power according to the ratio of 1W to the input power to the dipole. For system check, the calibration of the power amplifier is deemed not critically required for correct

measurement; the power meter is critical and we do have calibration for it.

5. Attenuator insertion loss is calibrated by the network Analyzer, which the calibration is valid, before system check.
6. N.C.R means No Calibration Requirement.

7. Tissue Simulating Liquids

For SAR measurement of the field distribution inside the phantom, the phantom must be filled with homogeneous tissue simulating liquid to a depth of at least 15cm. For head SAR testing, the liquid height from the ear reference point (ERP) of the phantom to the liquid top surface is larger than15cm.Forbody SAR testing, the liquid height from the center of the flat phantom to the liquid top surface is larger than 15cm, which is shown in Fig. 7.1. 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. 7.2.The nominal dielectric values of the tissue simulating liquids in the phantom and the tolerance of 5%are listed in below table.

Fig 7.1 Photo of Liquid Height for Head SAR

Fig 7.2 Photo of Liquid Height for Body SAR

The following table gives the recipes for tissue simulating liquids

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

Simulating Liquid for 5GHz, Manufactured by SPEAG

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

Note: Please refer to the validation results for dielectric parameters of each frequency band.

The dielectric properties of the tissue simulating liquids were verified prior to the SAR evaluation using an Agilent 85033E Dielectric Probe Kit and an Agilent Network Analyzer.

Table 1: Dielectric Performance of Tissue Simulating Liquid

Frequency (MHz)	Tissue Type	Liquid Temp. (℃)	Conductivity (σ)	Conductivity Target (σ)	Delta (σ) (%)	Limit (%)	Date
2450	HSL	22.2	1.835	1.80	1.94	±5	2021.04.28
5250	HSL	22.1	3.183	3.05	4.36	±5	2021.04.29
5750	HSL	22.2	3.442	3.34	3.05	±5	2021.04.30

Frequency (MHz)	Tissue Type	Liquid Temp. (℃)	Permittivity (ε_r)	Permittivity Target (ε_r)	Delta (ε_r) (%)	Limit (%)	Date
2450	HSL	22.2	38.922	39.20	-0.71	±5	2021.04.28
5250	HSL	22.1	36.284	37.70	-3.76	±5	2021.04.29
5750	HSL	22.2	36.261	37.00	-2.00	±5	2021.04.30

8. SAR System Verification

Each DASY system is equipped with one or more system validation kits. These units, together with the predefined measurement procedures within the DASY software, enable the user to conduct the system performance check and system validation. System validation kit includes a dipole, tripod holder to fix it underneath the flat phantom and a corresponding distance holder.

8.1. Purpose of System Performance Check

The system performance check verifies that the system operates within its specifications. System and operator errors can be detected and corrected. It is recommended that the system performance check be performed prior to any usage of the system in order to guarantee reproducible results. The system performance check uses normal SAR measurements in a simplified setup with a well characterized source. This setup was selected to give a high sensitivity to all parameters that might fail or vary over time. The system check does not intend to replace the calibration of the components, but indicates situations where the system uncertainty is exceeded due to drift or failure.

8.2. System Setup

The output power on dipole port must be calibrated to 24 dBm (250 mW) before dipole is connected.
In the simplified setup for system evaluation, the DUT is replaced by a calibrated dipole and the power source is replaced by a continuous wave which comes from a signal generator. The calibrated dipole must be placed beneath the flat phantom section of the SAM twin phantom with the correct distance holder. The distance holder should touch the phantom surface with a light pressure at the reference marking and be oriented parallel to the long side of the phantom. The system check verifies that the system operates within its specifications. It is performed daily or before every SAR measurement. The system check uses normal SAR measurements in the flat section of the phantom with a matched dipole at a specified distance. The system verification setup is shown as below.

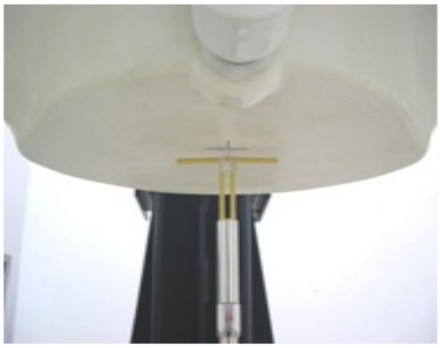


Fig 8.1 Photo of Dipole Setup

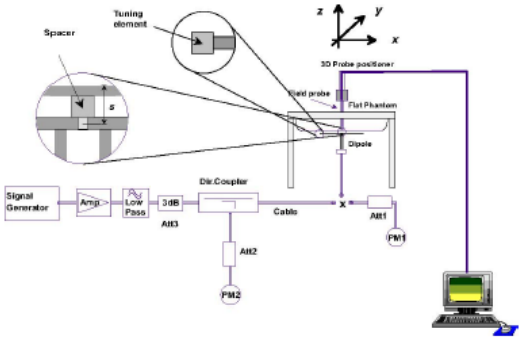


Fig 8.2 System Setup for System Evaluation

8.3. Validation Results

After system check testing, the SAR result will be normalized to 1W forward input power and compared with the reference SAR value derived from validation dipole certificate report. The deviation of system check should be within 10 %.

<Validation Setup>

Dipole S/N	Probe S/N	DAE S/N
D2450V2-805	3823	480
D5GHzV2-1176-5250	3823	480
D5GHzV2-1176-5750	3823	480

<1g SAR>

Date	Freq. (MHz)	Tissue Type	Input Power (mW)	Measured 1g SAR (W/kg)	Targeted 1g SAR (W/kg)	Normalized 1g SAR (W/kg)	Deviation (%)
2021.04.28	2450	HSL	250	13.52	52.00	54.08	4.00
2021.04.29	5250	HSL	100	8.22	78.90	82.2	4.18
2021.04.30	5750	HSL	100	8.35	80.00	83.5	4.38

<10g SAR>

Date	Freq. (MHz)	Tissue Type	Input Power (mW)	Measured 10g SAR (W/kg)	Targeted 10g SAR (W/kg)	Normalized 10g SAR (W/kg)	Deviation (%)
2021.04.28	2450	HSL	250	6.25	24.10	25	3.73
2021.04.29	5250	HSL	100	2.35	22.50	23.5	4.44
2021.04.30	5750	HSL	100	2.33	22.60	23.3	3.10

Note: System checks the specific test data please see Annex C.

9. EUT Testing Position

This EUT was tested in six different positions. They are right cheek/right tilted/left cheek/left tilted for head, Front/Back of the EUT with phantom 10 mm gap, as illustrated below, please refer to Appendix B for the test setup photos.

9.1. Body-Supported Device Configurations

According to KDB 616217 section 4.3, SAR should be separately assessed with each surface and separation distance positioned against the flat phantom that correspond to the intended use as specified by the manufacturer. The antennas in tablets are typically located near the back (bottom) surface and/or along the edges of the devices; therefore, SAR evaluation is required for these configurations. Exposures from antennas through the front (top) surface of the display section of a full-size tablet, away from the edges, are generally limited to the user's hands. Exposures to hands for typical consumer transmitters used in tablets are not expected to exceed the extremity SAR limit; therefore, SAR evaluation for the front surface of tablet display screens are generally not necessary, except for tablets that are designed to require continuous operations with the hand(s) next to the antenna(s).
To position the device parallel to the phantom surface with either keypad up or down.
To adjust the device parallel to the flat phantom.
To adjust the distance between the device surface and the flat phantom to 0 mm.
When each surface is measurement, the SAR Test Exclusion Threshold in KDB 447498 should be applied.

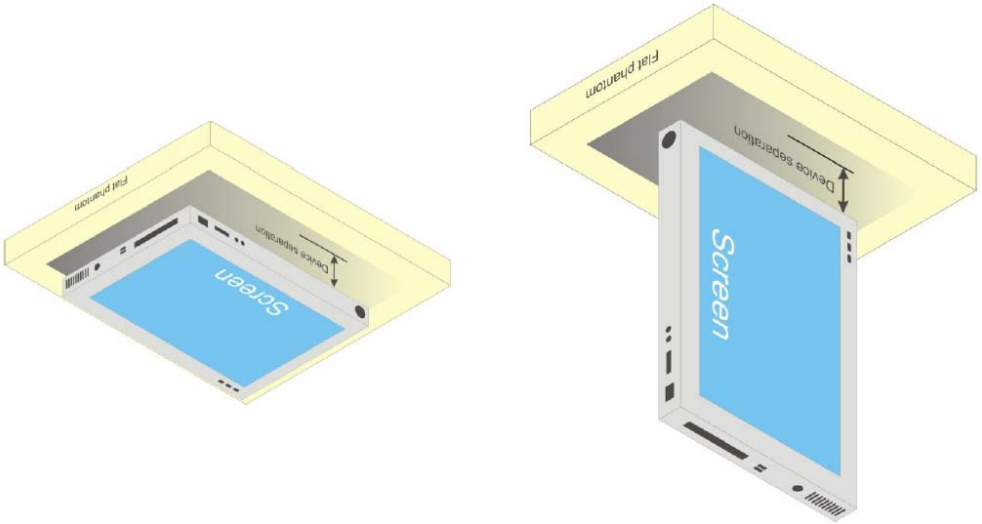


Fig 9.1 Illustration for Body Worn Position

9.2. Hotspot Mode Exposure Position Conditions

For handsets that support hotspot mode operations, with wireless router capabilities and various web browsing functions, the relevant hand and body exposure conditions are tested according to the hotspot SAR procedures in KDB 941225. A test separation distance of 10 mm is required between the phantom and all surfaces and edges with a transmitting antenna located within 25 mm from that surface or edge. When the form factor of a handset is smaller than 9 cm x 5 cm, a test separation distance of 5 mm (instead of 10 mm) is required for testing hotspot mode. When the separation distance required for body-worn accessory testing is larger than or equal to that tested for hotspot mode, in the same wireless mode and for the same surface of the phone, the hotspot mode SAR data may be used to support body-worn accessory SAR compliance for that particular configuration (surface).

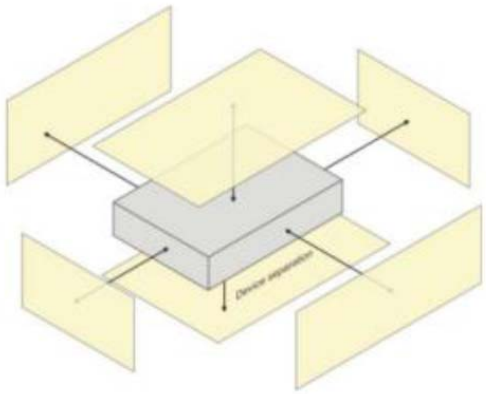


Fig 9.2 Illustration for Hotspot Position

10. 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.

10.1. 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 form 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.

10.2. 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.

10.3. Area Scan Procedures

Area scans are defined prior to the measurement process being executed with a user defined variable spacing between each measurement point (integral) allowing low uncertainty measurements to be conducted. Scans defined for FCC applications utilize a 10mm² step integral, with 1mm interpolation used to locate the peak SAR area used for zoom scan assessments.

When an Area Scan has measured all reachable points, it computes the field maxima founding the scanned area, within a range of the global maximum. The range (in dB) is specified in the standards for compliance testing. For example, a 2 dB range is required in IEEE1528-2003, EN 50361 and IEC 62209 standards, whereby 3 dB is a requirement when compliance is assessed in accordance with the ARIB standard (Japan).

10.4. Zoom Scan Procedures

Zoom Scans are used to assess the peak spatial SAR values within a cubic averaging volume containing 1 g and 10 g of simulated tissue. A density of 1000 kg/m³ is used to represent the head and body tissue density and not the phantom liquid density, in order to be consistent with the definition of the liquid dielectric properties, i.e. the side length of the 1g cube is 10mm, with the side length of the 10 g cube 21,5mm.The zoom scan integer steps can be user defined so as to reduce uncertainty, but normal practice for typical test applications utilize a physical step of 5x5x7 (8mmx8mmx5mm) providing a volume of 32mm in the X & Y axis, and 30mm in the Z axis.

10.5. SAR Averaged Methods

In DASY, the interpolation and extrapolation are both based on the modified Quadratic Sheppard's method. The interpolation scheme combines a least-square fitted function method and a weighted average method which are the two basic types of computational interpolation and approximation.

Extrapolation routines are used to obtain SAR values between the lowest measurement points and the inner phantom surface. The extrapolation distance is determined by the surface detection distance and the probe sensor offset. The uncertainty increases with the extrapolation distance. To keep the uncertainty within 1% for the 1 g and 10 g cubes, the extrapolation distance should not be larger than 5 mm.

10.6. Power Drift Monitoring

All SAR testing is under the DUT 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 DUT 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 drift more than 5%, the SAR will be retested.

11. SAR Test Procedure

11.1. General Scan Requirements

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.

			≤ 3 GHz	> 3 GHz
Maximum distance from closest measurement point (geometric center of probe sensors) to phantom surface			5 mm ± 1 mm	½·δ·ln(2) mm ± 0.5 mm
Maximum probe angle from probe axis to phantom surface normal at the measurement location			30° ± 1°	20° ± 1°
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 ≤ 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}			≤ 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: $\Delta z_{Zoom}(n)$		≤ 5 mm	3 – 4 GHz: ≤ 4 mm 4 – 5 GHz: ≤ 3 mm 5 – 6 GHz: ≤ 2 mm
	graded grid	$\Delta z_{Zoom}(1)$: between 1st two points closest to phantom surface	≤ 4 mm	3 – 4 GHz: ≤ 3 mm 4 – 5 GHz: ≤ 2.5 mm 5 – 6 GHz: ≤ 2 mm
		$\Delta z_{Zoom}(n>1)$: between subsequent points	≤ 1.5·$\Delta z_{Zoom}(n-1)$ mm	
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 IEEE Std 1528-2013 for details.

* When zoom scan is required and the *reported* SAR from the *area scan based 1-g SAR estimation* procedures of KDB Publication 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.

11.2. Test Procedure

The Following steps are used for each test position

1. Establish a call with the maximum output power with a base station simulator. The connection between the mobile and the base station simulator is established via air interface.
2. Measurement of the local E-field value at a fixed location. This value serves as a reference value for calculating a possible power drift.
3. Measurement of the SAR distribution with a grid of 8 to 16mm * 8 to16 mm and a constant distance to the inner surface of the phantom. Since the sensors cannot directly measure at the inner phantom surface, the values between the sensors and the inner phantom surface are extrapolated. With these values the area of the maximum SAR is calculated by an interpolation scheme.
4. Around this point, a cube of 30 * 30 * 30 mm or 32 * 32 * 32 mm is assessed by measuring 5 or 8 * 5 or 8*4 or 5 mm. With these data, the peak spatial-average SAR value can be calculated.

11.3. Description of Interpolation/Extrapolation Scheme

The local SAR inside the phantom is measured using small dipole sensing elements inside a probe body. The probe tip must not be in contact with the phantom surface in order to minimize measurements errors, but the highest local SAR will occur at the surface of the phantom.

An extrapolation is using to determinate this highest local SAR values. The extrapolation is based on a fourth-order least-square polynomial fit of measured data. The local SAR value is then extrapolated from the liquid surface with a 1mm step.

The measurements have to be performed over a limited time (due to the duration of the battery) so the step of measurement is high. It could vary between 5 and 8 mm. To obtain an accurate assessment of the maximum SAR averaged over 10 grams and 1 gram requires a very fine resolution in the three dimensional scanned data array.

12. SAR Test Configuration

<WLAN 2.4GHz>

1. SAR is measured for 2.4 GHz 802.11b DSSS using either the fixed test position or, when applicable, the initial test position procedure. SAR test reduction is determined according to the following:
   a. 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.
   b. When the reported SAR is > 0.8 W/kg, SAR is required for that position 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. 2.4 GHz 802.11 g/n OFDM are additionally evaluated for SAR if the highest reported SAR for 802.11b, adjusted by the ratio of the OFDM to DSSS specified maximum output power, is > 1.2 W/kg. When SAR is required for OFDM modes in 2.4 GHz band, the Initial Test Configuration Procedures should be followed.
3. For held-to-ear and hotspot operations, the initial test position procedures were applied. The test position with the highest extrapolated peak SAR will be used as the initial test position. When reported SAR for the initial test position is ≤ 0.4 W/kg, no additional testing for the remaining test positions was required. Otherwise, SAR is evaluated at the subsequent highest peak SAR positions until the reported SAR result is ≤ 0.8 W/kg or all test positions are measured.
4. Justification for test configurations for WLAN per KDB Publication 248227 D02DR02-41929 for 2.4 GHz WI-FI single transmission chain operations, the highest measured maximum output power channel for DSSS was selected for SAR measurement. SAR for OFDM modes (2.4 GHz802.11g/n) was not required due to the maximum allowed powers and the highest reported DSSSSAR.
5. A fixed level power reduction is applied for WiFi when handset operates "held to the body" condition or "held to the ear" condition, the power reduction triggered by audio receiver detection and call establish status.
6. Per KDB 248227 D01v02r02, In the 2.4 GHz band, separate SAR procedures are applied to DSSS and OFDM configurations to simplify DSSS test requirements.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.

<WLAN 5GHz>

A) 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.
4. 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.

B) 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.

C) 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 band width 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.
5. The channel closest to mid-band frequency is selected for SAR measurement.
6. 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.

D) 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 sametransmitter and antenna(s) are used for U-NII-1 and U-NII-2A bands, additional SAR test reduction Vapplies. When band gap channels between U-NII-2C band and 5.8 GHz U-NII-3 or §15.247 bandare supported, the highest maximum output power transmission mode configuration and maximumoutput power channel across the bands must be used to determine SAR test reduction, accordingto the initial test configuration and subsequent test configuration requirements. In applying theinitial test configuration and subsequent test configuration procedures, the 802.11 transmissionconfiguration with the highest specified maximum output power and the channel within a testconfiguration with the highest measured maximum output power should be clearly distinguished toapply the procedures.

13. Conducted RF Output Power

➢ **WLAN Conducted Power**

	Mode	Channel	Frequency (MHz)	Average Power (dBm)	Tune-Up Limit	Power Setting	Duty Cycle %
2.4GHz WLAN	802.11b 1Mbps	CH 1	2412	13.36	14.00	13.00	100.00
		CH 6	2437	13.39	14.00	13.00	
		CH 11	2462	13.77	14.50	13.00	
	802.11g 6Mbps	CH 1	2412	10.41	11.00	10.00	96.86
		CH 6	2437	10.34	11.00	10.00	
		CH 11	2462	10.31	11.00	10.00	
	802.11n-HT20 MCS0	CH 1	2412	10.26	10.50	10.00	96.66
		CH 6	2437	10.23	10.50	10.00	
		CH 11	2462	10.21	10.50	10.00	
	802.11n-HT40 MCS0	CH 3	2422	10.50	11.00	10.00	93.51
		CH 6	2437	10.49	11.00	10.00	
		CH 9	2452	10.41	11.00	10.00	

	Mode	Channel	Frequency (MHz)	Average Power (dBm)	Tune-Up Limit	Power Setting	Duty Cycle %
5.2GHz WLAN	802.11a 6Mbps	CH 36	5180	7.43	8.00	13	96.88
		CH 44	5220	6.83	7.50	13	
		CH 48	5240	7.50	8.00	13	
	802.11n-HT20 MCS0	CH 36	5180	9.82	10.50	16	96.66
		CH 44	5220	9.92	10.50	16	
		CH 48	5240	9.91	10.50	16	
	802.11n-HT40 MCS0	CH 38	5190	8.27	8.50	14	93.56
		CH 46	5230	7.83	8.50	14	
	802.11ac-VHT20 MCS0	CH 36	5180	9.68	10.00	15	96.68
		CH 44	5220	9.85	10.50	15	
		CH 48	5240	9.77	10.50	15	
	802.11ac-VHT40 MCS0	CH 38	5190	10.33	11.00	16	93.57
		CH 46	5230	10.88	11.50	16	
	802.11ac-VHT80 MCS0	CH 42	5210	7.07	7.50	13	87.97

	Mode	Channel	Frequency (MHz)	Average Power (dBm)	Tune-Up Limit	Power Setting	Duty Cycle %
5.8GHz WLAN	802.11a MCS0	CH 149	5745	10.23	10.50	17	96.88
		CH 157	5785	9.78	10.50	17	
		CH 165	5825	9.48	10.00	17	
	802.11n-HT20 MCS0	CH 149	5745	10.71	11.00	18	96.66
		CH 157	5785	10.03	10.50	18	
		CH 165	5825	9.99	10.50	18	
	802.11n-HT40 MCS0	CH 151	5755	9.38	10.00	20	93.56
		CH 159	5795	8.66	9.00	20	
	802.11ac-VHT20 MCS0	CH 149	5745	9.13	9.50	17	96.68
		CH 157	5785	8.83	9.50	17	
		CH 165	5825	8.36	9.00	17	
	802.11ac-VHT40 MCS0	CH 151	5755	9.56	10.00	17	93.57
		CH 159	5795	9.47	10.00	17	
	802.11ac-VHT80 MCS0	CH 155	5775	8.95	9.50	27	87.97

Note:

1. Per KDB 248227 D01v02r02, choose the highest output power channel to test SAR and determine further SAR exclusion.
2. Per KDB 248227 D01v02r02, In the 2.4 GHz band, separate SAR procedures are applied to DSSS and OFDM configurations to simplify DSSS test requirements.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.
3. The output power of all data rate were pre-scan, just the worst case (the lowest data rate) of all mode were shown in report.

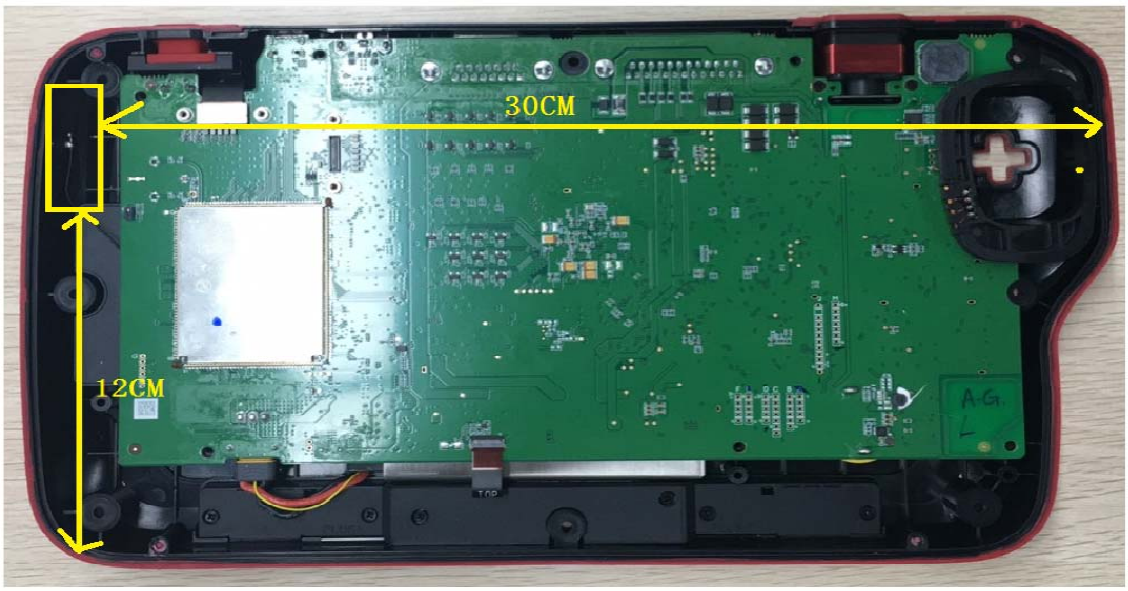
➢ **Bluetooth Conducted Power**

Mode	Channel	Frequency (MHz)	Average Power (dBm)		
			1Mbps	2Mbps	3Mbps
BR / EDR	CH 00	2402	9.69	6.78	6.86
	CH 39	2441	9.18	5.88	6.04
	CH 78	2480	9.56	6.67	6.74
Tune-up Limit			9.8	7	7

Mode	Channel	Frequency (MHz)	Average Power (dBm)
			GFSK
LE	CH 00	2402	-2.92
	CH 19	2440	-2.86
	CH 39	2480	-3.30
Tune-up Limit (dBm)			-2

14. Hotspot Mode Evaluation Procedure

➢ **EUT Antenna Location**



➢ **Test Positions Consideration**

SAR Exclusion Calculations for Antenna < 50mm from the User													
Antennas	Freq. (MHz)	Max. Tune-up Power		Distance of Antennas to EUT Edge/Surface (mm)					Calculated Threshold Value (SAR Test Exclusion Power, mW)				
		dBm	mW	Bott. Face	Edge 1	Edge 2	Edge 3	Edge 4	Bott. Face	Edge 1	Edge 2	Edge 3	Edge 4
WLAN 2.4GHz	2462	14.50	28.0	8.0	15.0	300.0	120.0	2.0	5.5	2.9	/	/	8.8
WLAN 5.2GHz	5825	11.50	14.0	8.0	15.0	300.0	120.0	2.0	4.2	2.3	/	/	6.8
WLAN 5.8GHz	5825	11.00	13.0	8.0	15.0	300.0	120.0	2.0	3.9	2.1	/	/	6.3
Bluetooth	2480	6.00	4.0	8.0	15.0	300.0	120.0	2.0	0.8	0.4	/	/	1.3

SAR Exclusion Calculations for Antenna > 50mm from the User													
Antennas	Freq. (MHz)	Max. Tune-up Power		Distance of Antennas to EUT Edge/Surface (mm)					Calculated Threshold Value (SAR Test Exclusion Power, mW)				
		dBm	mW	Bott. Face	Edge 1	Edge 2	Edge 3	Edge 4	Bott. Face	Edge 1	Edge 2	Edge 3	Edge 4
WLAN 2.4GHz	2462	14.50	28.0	8.0	15.0	300.0	120.0	2.0	/	/	2596.0	796.0	/
WLAN 5.2GHz	5825	11.50	14.0	8.0	15.0	300.0	120.0	2.0	/	/	2562.0	762.0	/
WLAN 5.8GHz	5825	11.00	13.0	8.0	15.0	300.0	120.0	2.0	/	/	2562.0	762.0	/
Bluetooth	2480	6.00	4.0	8.0	15.0	300.0	120.0	2.0	/	/	2595.0	795.0	/

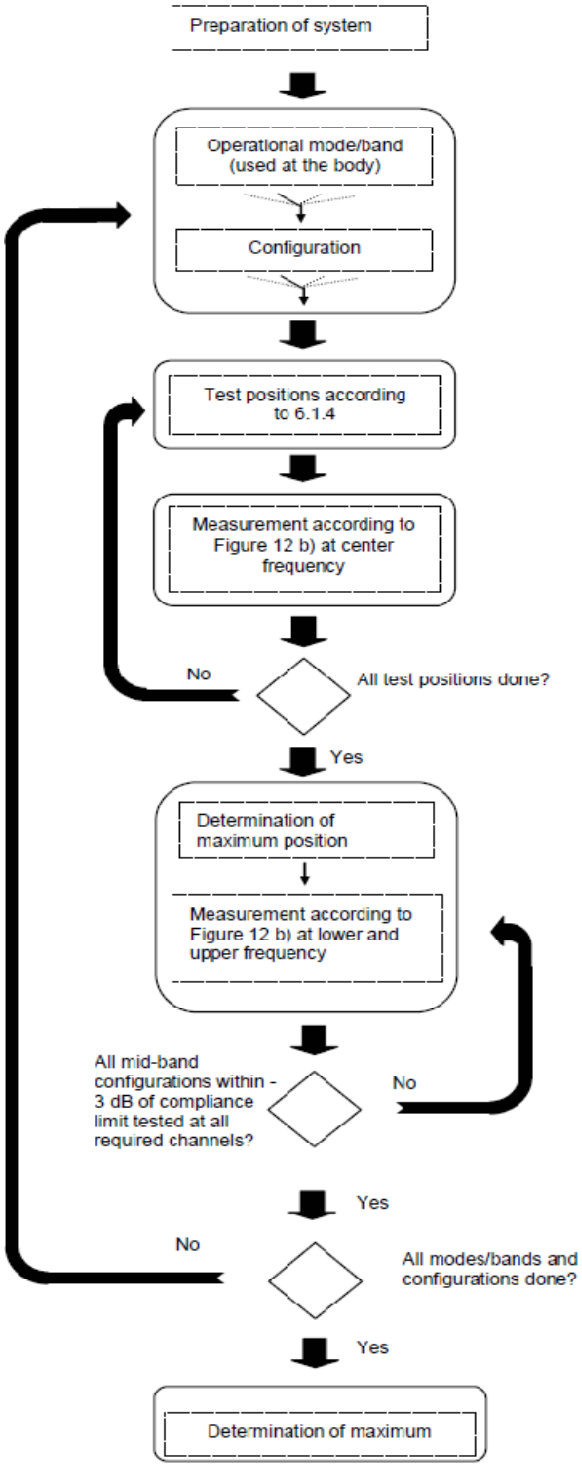
Test Positions					
Antennas	**Bott. Face**	**Edge 1**	**Edge 2**	**Edge 3**	**Edge 4**
WLAN 2.4GHz	Yes	No	No	No	Yes
WLAN 5.2GHz	Yes	No	No	No	Yes
WLAN 5.8GHz	Yes	No	No	No	Yes
Bluetooth	No	No	No	No	No

Note:

1. Referring to KDB 616217 D04v01r02, when the overall diagonal dimension of display is > 20 cm, the test distance is 0 mm; the SAR Test Exclusion Threshold in KDB 447498 section 4.3.1 can be applied to determine SAR test exclusion for adjacent edge configurations.
2. Per KDB 616217 D04v01r02, SAR evaluation for the front surface of tablet display screens is generally not necessary.
3. Per KDB 616217 D04v01r02, additional testing for hotspot SAR is not required.

15. Block Diagram of the Tests to be Performed

15.1. Body



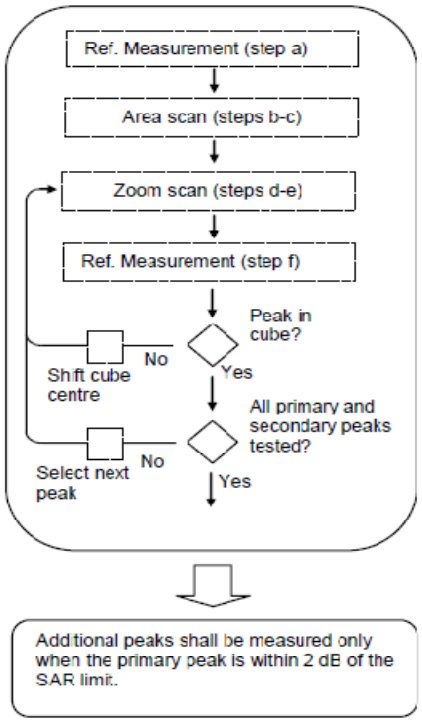


Figure 12b – General procedure

16. Test Results List

16.1. Test Guidance

1. Per KDB 447498 D01v06, the reported SAR is the measured SAR value adjusted for maximum tune-up tolerance.
   a. Tune-up scaling Factor = tune-up limit power (mW) / EUT RF power (mW), where tune-up limit is the maximum rated power among all production units.
   b. For SAR testing of WLAN signal with non-100% duty cycle, the measured SAR is scaled-up by the duty cycle scaling factor which is equal to "1/(duty cycle)".
   c. For WWAN: Reported SAR(W/kg)= Measured SAR(W/kg)*Tune-up Scaling Factor.
   d. For WLAN/Bluetooth: Reported SAR(W/kg)= Measured SAR(W/kg)* Duty Cycle scaling factor * Tune-up scaling factor.
2. Per KDB 447498 D01v06, for each exposure position, testing of other required channels within the operating mode of a frequency band is not required when the *reported* 1-g or 10-g SAR for the mid-band or highest output power channel is:
   ≤ 0.8 W/kg or 2.0 W/kg, for 1-g or 10-g respectively, when the transmission band is ≤ 100 MHz
   ≤ 0.6 W/kg or 1.5 W/kg, for 1-g or 10-g respectively, when the transmission band is between 100 MHz and 200 MHz
   ≤ 0.4 W/kg or 1.0 W/kg, for 1-g or 10-g respectively, when the transmission band is ≥ 200 MHz
3. Per KDB 865664 D01v01r04, for each frequency band, repeated SAR measurement is required only when the measured SAR is ≥0.8W/kg.
4. Per KDB 648474 D04v01r03, when the reported SAR for a body-worn accessory measured without a headset connected to the handset is ≤ 1.2 W/kg, SAR testing with a headset connected to the handset is not required.
5. Per KDB648474 D04v01r03, for smart phones with a display diagonal dimension > 15.0 cm or an overall diagonal dimension > 16.0 cm, when hotspot mode applies, 10-g extremity SAR is required only for the surfaces and edges with hotspot mode 1-g reported SAR > 1.2 W/kg, however, when power reduction applies to hotspot mode the measured SAR must be scaled to the maximum output power, including tolerance, allowed for tablet modes to compare with the 1.2 W/kg SAR test reduction threshold.

6. Per KDB248227 D01v02r02, 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. The test frequencies established using test mode must correspond to the actual channel frequencies required for operations in the U.S. When 802.11 frame gaps are accounted for in the transmission, a maximum transmission duty factor of 92 - 96% is typically achievable in most test mode configurations. A minimum transmission duty factor of 85% is required to avoid certain hardware and device implementation issues related to wide range SAR scaling. In addition, a periodic transmission duty factor is required for current generation SAR systems to measure SAR correctly. Unless it is permitted by specific KDB procedures or continuous transmission is specifically restricted by the device, the reported SAR must be scaled to 100% transmission duty factor to determine compliance at the maximum tune-up tolerance limit. When a device is not capable of sustaining continuous transmission or the output can become nonlinear, and it is limited by hardware design and unable to transmit at higher than 85% duty factor, a periodic duty factor within 15% of the maximum duty factor the device is capable of transmitting should be used. The reported SAR must be scaled to the maximum transmission duty factor to determine compliance. Descriptions of the procedures applied to establish the specific duty factor used for SAR testing are required in SAR reports to support the test results.
7. According to the report (Report No. SZ20120300W05/06), the maximum E-field level at 3m which was converted to EIRP is closed to zero, therefore it is not required for RF exposure.

16.2. Body SAR Data

➢ **WLAN Body SAR**

Plot No.	Band/Mode	Test Position	Ch.	Average Power (dBm)	Tune-Up Limit (dBm)	Tune-up Scaling Factor	Meas. SAR_{1g} (W/kg)	Reported SAR_{1g} (W/kg)
	WLAN2.4GHz/802.11b	Bottom Face	11	13.77	14.50	1.183	0.210	0.249
	WLAN2.4GHz802.11b	Edge 1	11	13.77	14.50	1.183	0.019	0.023
1#	WLAN2.4GHz/802.11b	Edge 4	11	13.77	14.50	1.183	0.746	0.883
	WLAN2.4GHz802.11b	Edge 4	1	13.36	14.00	1.159	0.760	0.881
	WLAN2.4GHz/802.11b	Edge 4	6	13.39	14.00	1.151	0.738	0.849
	WLAN5.2GHz/802.11ac-40	Bottom Face	46	10.88	11.50	1.153	0.485	0.598
	WLAN5.2GHz/802.11ac-40	Edge 1	46	10.88	11.50	1.153	0.014	0.017
	WLAN5.2GHz/802.11ac-40	Edge 4	46	10.88	11.50	1.153	0.654	0.807
2#	WLAN5.2GHz/802.11ac-40	Edge 4	38	10.33	11.00	1.167	0.695	0.867
	WLAN5.8GHz/802.11n-20	Bottom Face	149	10.71	11.00	1.069	0.782	0.865
	WLAN5.8GHz/802.11n-20	Edge 1	149	10.71	11.00	1.069	0.006	0.006
3#	WLAN5.8GHz/802.11n-20	Edge 4	149	10.71	11.00	1.069	0.910	1.007
	WLAN5.8GHz/802.11n-20	Edge 4	157	10.03	10.50	1.114	0.837	0.965
	WLAN5.8GHz/802.11n-20	Edge 4	165	9.99	10.50	1.125	0.804	0.936

Note: The WLAN Reported 1g SAR (W/kg) has been calculated together with the duty cycle scaling factor 1.0 for WLAN 2.4GHz, 1.069 for WLAN 5.2GHz, 1.035 for WLAN 5.8GHz.

➢ **Bluetooth Body SAR**

When standalone SAR is not required to be measured, per FCC KDB 447498 D01v06 4.3.2), the following equation must be used to estimate the standalone 1g SAR.

$$\text{Estimated SAR} = \frac{\sqrt{f(GHz)}}{7.5} \cdot \frac{\text{Max. power of channel, mW}}{\text{Min. Separation Distance, mm}}$$

Channel	Frequency (GHz)	Max. Tune-up Power (dBm)	Max. Power(mW)	Test Distance (mm)	Result	Exclusion Thresholds for 1-g SAR
CH 39	2.402	9.8	9.55	5	2.96	3.0

Mode	Max. Tune-up Power (dBm)	Exposure Position	Body
		Test Distance (mm)	5
Bluetooth	9.8	Estimated SAR (W/kg)	0.395

Plot No.	Band/Mode	Test Position	CH.	Ave. Power (dBm)	Tune-up Limit (dBm)	Tune-up Scaling Factor	Meas. SAR_{1g} (W/kg)	Reported SAR_{1g} (W/kg)
	Bluetooth/1Mbps	Bottom Face	0	9.69	9.80	1.026	0.395	0.478
	Bluetooth/1Mbps	Edge 1	0	9.69	9.80	1.026	0.395	0.478
	Bluetooth/1Mbps	Edge 4	0	9.69	9.80	1.026	0.395	0.478

Note:

1. According to 2016 Oct. TCB workshop for Bluetooth SAR consideration and the theoretical du ty cycle is 83.3%, therefore the actual duty cycle will be scaled up to the theoretical value of Bluetooth reported SAR calculation. The duty cycle of Bluetooth is 84.8%, Therefore the duty cycle scaling factor 1.179 should be used to calculating the reported SAR.

16.3. Repeated SAR Assessment

In accordance with published RF Exposure KDB procedure 865664 D01 SAR measurement 100 MHz to 6 GHz. These additional measurements are repeated after the completion of all measurements requiring the same head or body tissue-equivalent medium in a frequency band. The test device should be returned to ambient conditions (normal room temperature) with the battery fully charged before it is re-mounted on the device holder for the repeated measurement(s) to minimize any unexpected variations in the repeated results.

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

➢ **Repeated SAR**

Plot No.	Band/Mode	Test Position	CH.	Ave. Power (dBm)	Tune-up Limit (dBm)	Tune-up Scaling Factor	Meas. SAR_{1g} (W/kg)	Reported SAR_{1g} (W/kg)
OR.	WLAN5.8GHz/802.11n-20	Edge 4	149	10.71	11.00	1.069	0.910	1.007
1st	WLAN5.8GHz/802.11n-20	Edge 4	149	10.71	11.00	1.069	0.901	0.997

17. Simultaneous Transmission Evaluation

Remark:

WLAN 2.4GHz/5GHz and Bluetooth share the same antenna, both of them cannot transmit simultaneously.

18. Uncertainty Assessment

The component of uncertainly may generally be categorized according to the methods used to evaluate them. The evaluation of uncertainly by the statistical analysis of a series of observations is termed a Type An 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 table below.

Uncertainty	Normal	Rectangular	Triangular	U-Shape
Multi-plying Factor[(a)]	1/k[(b)]	1/√3	1/√6	1/√2

Table 18.1. 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) κ 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.

Error Description	Uncertainty Value (±%)	Probability	Divisor	(Ci) 1g	(Ci) 10g	Standard Uncertainty (1g) (±%)	Standard Uncertainty (10g) (±%)
Measurement System							
Probe Calibration	6.0	N	1	1	1	6.0	6.0
Axial Isotropy	4.7	R	1.732	0.7	0.7	1.9	1.9
Hemispherical Isotropy	9.6	R	1.732	0.7	0.7	3.9	3.9
Boundary Effects	1.0	R	1.732	1	1	0.6	0.6
Linearity	4.7	R	1.732	1	1	2.7	2.7
System Detection Limits	1.0	R	1.732	1	1	0.6	0.6
Modulation Response	3.2	R	1.732	1	1	1.8	1.8
Readout Electronics	0.3	N	1	1	1	0.3	0.3
Response Time	0.0	R	1.732	1	1	0.0	0.0
Integration Time	2.6	R	1.732	1	1	1.5	1.5
RF Ambient Noise	3.0	R	1.732	1	1	1.7	1.7
RF Ambient Reflections	3.0	R	1.732	1	1	1.7	1.7
Probe Positioner	0.4	R	1.732	1	1	0.2	0.2
Probe Positioning	2.9	R	1.732	1	1	1.7	1.7
Max. SAR Eval.	2.0	R	1.732	1	1	1.2	1.2
Test Sample Related							
Device Positioning	3.0	N	1	1	1	3.0	3.0
Device Holder	3.6	N	1	1	1	0.089	0.089
Power Drift	5.0	R	1.732	1	1	2.9	2.9
Power Scaling	0.0	R	1.732	1	1	0.0	0.0
Phantom and Setup							
Phantom Uncertainty	6.1	R	1.732	1	1	3.5	3.5
SAR Correction	0.0	R	1.732	1	0.84	0.0	0.0
Liquid Conductivity Repeatability	0.2	N	1	0.78	0.71	0.1	0.1
Liquid Conductivity (target)	5.0	R	1.732	0.78	0.71	2.3	2.0
Liquid Conductivity (mea.)	2.5	R	1.732	0.78	0.71	1.1	1.0
Temp. unc. - Conductivity	3.4	R	1.732	0.78	0.71	1.5	1.4
Liquid Permittivity Repeatability	0.15	N	1	0.23	0.26	0.0	0.0
Liquid Permittivity (target)	5.0	R	1.732	0.23	0.26	0.7	0.8
Liquid Permittivity (mea.)	2.5	R	1.732	0.23	0.26	0.3	0.4
Temp. unc. - Permittivity	0.83	R	1.732	0.23	0.26	0.1	0.1
Combined Std. Uncertainty						11.4%	11.4%
Coverage Factor for 95 %						K=2	K=2
Expanded STD Uncertainty						22.9%	22.7%

Error Description	Uncertainty Value (±%)	Probability	Divisor	(Ci) 1g	(Ci) 10g	Standard Uncertainty (1g) (±%)	Standard Uncertainty (10g) (±%)
Measurement System							
Probe Calibration	6.55	N	1	1	1	6.0	6.0
Axial Isotropy	4.7	R	1.732	0.7	0.7	1.9	1.9
Hemispherical Isotropy	9.6	R	1.732	0.7	0.7	3.9	3.9
Boundary Effects	2.0	R	1.732	1	1	1.2	1.2
Linearity	4.7	R	1.732	1	1	2.7	2.7
System Detection Limits	1.0	R	1.732	1	1	0.6	0.6
Modulation Response	3.2	R	1.732	1	1	1.8	1.8
Readout Electronics	0.3	N	1	1	1	0.3	0.3
Response Time	0.0	R	1.732	1	1	0.0	0.0
Integration Time	2.6	R	1.732	1	1	1.5	1.5
RF Ambient Noise	3.0	R	1.732	1	1	1.7	1.7
RF Ambient Reflections	3.0	R	1.732	1	1	1.7	1.7
Probe Positioner	0.4	R	1.732	1	1	0.2	0.2
Probe Positioning	6.7	R	1.732	1	1	3.9	3.9
Max. SAR Eval.	4.0	R	1.732	1	1	2.3	2.3
Test Sample Related							
Device Positioning	3.0	N	1	1	1	3.0	3.0
Device Holder	3.6	N	1	1	1	0.089	0.089
Power Drift	5.0	R	1.732	1	1	2.9	2.9
Power Scaling	0.0	R	1.732	1	1	0.0	0.0
Phantom and Setup							
Phantom Uncertainty	6.1	R	1.732	1	1	3.8	3.8
SAR Correction	0.0	R	1.732	1	0.84	0.0	0.0
Liquid Conductivity Repeatability	0.2	N	1	0.78	0.71	0.1	0.1
Liquid Conductivity (target)	5.0	R	1.732	0.78	0.71	2.3	2.0
Liquid Conductivity (mea.)	2.5	R	1.732	0.78	0.71	1.1	1.0
Temp. unc. - Conductivity	3.4	R	1.732	0.78	0.71	1.5	1.4
Liquid Permittivity Repeatability	0.15	N	1	0.23	0.26	0.0	0.0
Liquid Permittivity (target)	5.0	R	1.732	0.23	0.26	0.7	0.8
Liquid Permittivity (mea.)	2.5	R	1.732	0.23	0.26	0.3	0.4
Temp. unc. - Permittivity	0.83	R	1.732	0.23	0.26	0.1	0.1
Combined Std. Uncertainty						12.5%	12.5%
Coverage Factor for 95 %						K=2	K=2
Expanded STD Uncertainty						25.1 %	25.1%

Annex A General Information

1. Identification of the Responsible Testing Laboratory

Laboratory Name:	Shenzhen Morlab Communications Technology Co., Ltd.
Laboratory Address:	FL.3, Building A, FeiYang Science Park, No.8 LongChang Road, Block 67, BaoAn District, ShenZhen, GuangDong Province, P. R. China
Telephone:	+86 755 36698555
Facsimile:	+86 755 36698525

2. Identification of the Responsible Testing Location

Name:	Shenzhen Morlab Communications Technology Co., Ltd.
Address:	FL.3, Building A, FeiYang Science Park, No.8 LongChang Road, Block 67, BaoAn District, ShenZhen, GuangDong Province, P. R. China

3. Facilities and Accreditations

All measurement facilities used to collect the measurement data are located at FL.3, Building A, FeiYang Science Park, Block 67, BaoAn District, Shenzhen, 518101 P. R. China. The test site is constructed in conformance with the requirements of ANSI C63.10-2013 and CISPR Publication 22; the FCC designation number is CN1192, the test firm registration number is 226174.

Note：

The main report is end here and the other Annex (B,C,D,E) will be submitted separately.

****** END OF MAIN REPORT ******