

FCC SAR EVALUATION REPORT

**In accordance with the requirements of
FCC 47 CFR Part 2(2.1093) and
IEEE Std 1528-2013**

Product Name: Chromebook

Model No.: Centerm Chromebook M311A

Serial Model: See Page 7

Brand Name: Centerm

Report No.: AiTSZ-260416015FW1

FCC ID: 2AN9R-M311A

Prepared for

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TEST RESULT CERTIFICATION

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Product description

Product name: Chromebook
Trademark: Centerm
Model and/or type reference ..: Centerm Chromebook M311A
Serial Model.....: See Page 7
FCC 47 CFR Part 2(2.1093)

Standards: IEEE Std 1528-2013

Published RF exposure KDB procedures

This device described above has been tested by Guangdong Asia Hongke Test Technology Limited. In accordance with the measurement methods and procedures specified in IEEE Std 1528-2013 and KDB 865664 D01. Testing has shown that this device is capable of compliance with localized specific absorption rate (SAR) specified in FCC 47 CFR Part 2(2.1093). The test results in this report apply only to the tested sample of the stated device/equipment. Other similar device/equipment will not necessarily produce the same results due to production tolerance and measurement uncertainties.

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Test Sample Number: AiTSZ-260416015-1

Date of Test

Date (s) of performance of tests: Apr. 16, 2026 ~ Apr. 30, 2026

Date of Issue.....: May 12, 2026

Test Result: **Pass**

Reviewed by: _____

ken zou

Ken Zou

Approved by: _____

Jack Li

Jack Li



※ ※ Revision History ※ ※

REV.	DESCRIPTION	ISSUED DATE	REMARK
Rev.1.0	Initial Test Report Release	May 12, 2026	Jack Li

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1. General Information

1.1. RF exposure limits

(A).Limits for Occupational/Controlled Exposure (W/kg)

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

(B).Limits for General Population/Uncontrolled Exposure (W/kg)

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

NOTE: **Whole-Body SAR** is averaged over the entire body, **partial-body SAR** is averaged over any 1 gram 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.

Occupational/Controlled 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).

General Population/Uncontrolled Environments:

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

NOTE
TRUNK LIMIT
1.6 W/kg
APPLIED TO THIS EUT

1.2. Statement of Compliance

The maximum results of Specific Absorption Rate (SAR) found during testing as follows.

Band	Max SAR Value Reported(W/kg)		Max SAR Summation
	1-g back of screen (Separation distance of 0mm)		
	ANT1	ANT2	
2.4GHz WLAN	0.432	0.330	Body: 1.207
5.2GHz WLAN	0.599	0.608	
5.3GHz WLAN	0.539	0.511	
5.6GHz WLAN	0.526	0.487	
5.8GHz WLAN	0.614	0.486	

NOTE: The Max SAR Summation is calculated based on the same configuration and test position.

This device is in compliance with Specific Absorption Rate (SAR) for general population/uncontrolled exposure limits (1.6 W/kg) specified in FCC 47 CFR Part 2(2.1093), and had been tested in accordance with the measurement methods and procedures specified in IEEE Std 1528-2013 & KDB 865664 D01.

1.3. EUT Description

Device Information			
Product Name	Chromebook		
Model Name	Centerm Chromebook M311A		
Family Model	Centerm Enterprise Chromebook M311A, Chromebook M311A, M311A, M311A Plus, M****, M31****, M***** (“*” may be alphanumeric characters, blank or other characters)		
Model Difference	All the model are the same circuit and RF module, except the model names.		
Device Phase	Identical Prototype		
Exposure Category	General population / Uncontrolled environment		
Antenna Type	FPC Antenna		
Battery Information	DC 11.1V 3600mAh 39.96Wh Rechargeable Li-ion battery		
Hardware version	N/A		
Software version	N/A		
Device Operating Configurations			
Supporting Mode(s)	WLAN 2.4G/5G, Bluetooth		
Test Modulation	WLAN(DSSS/OFDM/OFDMA), Bluetooth(GFSK, $\pi/4$ -DQPSK, 8DPSK)		
Device Class	B		
Operating Frequency Range(s)	Band	Tx (MHz)	Rx (MHz)
	WLAN 2.4G	2412-2462	
	WLAN 5.2G	5180-5240	
	WLAN 5.3G	5260-5320	
	WLAN 5.6G	5500-5700	
	WLAN 5.8G	5745-5825	
	Bluetooth	2402-2480	

1.4. Test specification(s)

FCC 47 CFR Part 2(2.1093)
IEEE Std 1528-2013
KDB 865664 D01 SAR measurement 100 MHz to 6 GHz v01r04
KDB 865664 D02 RF Exposure Reporting v01r02
KDB 447498 D01 General RF Exposure Guidance v06
KDB 248227 D01 802.11 Wi-Fi SAR v02r02
KDB 616217 D04 SAR for laptop and tablets v01r02

1.5. Ambient Condition

Ambient temperature	20°C – 24°C
Relative Humidity	30% – 70%

1.6. Test Facility

Test Laboratory:

Guangdong Asia Hongke Test Technology Limited

B1/F, Building 11, Junfeng Industrial Park, Chongqing Road, Heping Community, Fuhai Street, Bao'an District, Shenzhen, Guangdong, China

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

FCC-Registration No.: 251906 Designation Number: CN1376

Guangdong Asia Hongke Test Technology Limited has been registered and fully described in a report filed with the (FCC) Federal Communications Commission. The acceptance letter from the FCC is maintained in our files.

IC —Registration No.: 31737 CAB identifier: CN0165

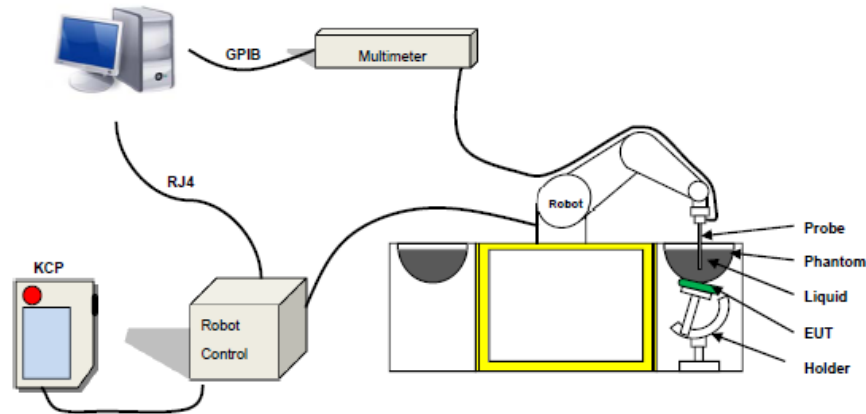
The 3m Semi-anechoic chamber of Guangdong Asia Hongke Test Technology Limited has been registered by Certification and Engineering Bureau of Industry Canada for radio equipment testing with Registration No.: 31737

A2LA-Lab Cert. No.: 7133.01

Guangdong Asia Hongke Test Technology Limited has been accredited by A2LA for technical competence in the field of electrical testing, and proved to be in compliance with ISO/IEC 17025: 2017 General Requirements for the Competence of Testing and Calibration Laboratories and any additional program requirements in the identified field of testing.

2. SAR Measurement System

2.1. SATIMO SAR Measurement Set-up Diagram



These measurements were performed with the automated near-field scanning system OPENSAR from SATIMO. The system is based on a high precision robot (working range: 901 mm), which positions the probes with a positional repeatability of better than ± 0.03 mm. The SAR measurements were conducted with dosimetric probe (manufactured by SATIMO), designed in the classical triangular configuration and optimized for dosimetric evaluation.

The first step of the field measurement is the evaluation of the voltages induced on the probe by the device under test. Probe diode detectors are nonlinear. Below the diode compression point, the output voltage is proportional to the square of the applied E-field; above the diode compression point, it is linear to the applied E-field. The compression point depends on the diode, and a calibration procedure is necessary for each sensor of the probe.

The Keithley multimeter reads the voltage of each sensor and send these three values to the PC. The corresponding E field value is calculated using the probe calibration factors, which are stored in the working directory. This evaluation includes linearization of the diode characteristics. The field calculation is done separately for each sensor. Each component of the E field is displayed on the "Dipole Area Scan Interface" and the total E field is displayed on the "3D Interface"

2.2. Robot

The SATIMO SAR system uses the high precision robots from KUKA. For the 6-axis controller system, the robot controller version (KUKA) from KUKA is used. The KUKA robot series have many features that are important for our application:



- High precision (repeatability ± 0.03 mm)
- High reliability (industrial design)
- Jerk-free straight movements
- Low ELF interference (the closed metallic construction shields against motor control fields)

2.3. Probe

This E-field detection probe is composed of three orthogonal dipoles linked to special Schottky diodes with low detection thresholds. The probe allows the measurement of electric fields in liquids such as the one defined in the IEEE and CENELEC standards.

For the measurements the Specific Dosimetric E-Field Probe EPGO 0523-403 with following specifications is used.



- Probe Length: 330 mm
- Length of Individual Dipoles: 2 mm
- Maximum external diameter: 8 mm
- Probe Tip External Diameter: 2.5 mm
- Distance between dipole/probe extremity: 1 mm
- Dynamic range: 0.01-100 W/kg
- Probe linearity: 3%
- Axial Isotropy: < 0.10 dB
- Spherical Isotropy: < 0.10 dB
- Calibration range: 150 MHz to 6 GHz for head & body simulating liquid.
- Angle between probe axis (evaluation axis) and surface normal line: less than 30°

2.3.1. E-Field Probe Calibration

Each probe needs to be calibrated according to a dosimetric assessment procedure with accuracy better than $\pm 10\%$. The spherical isotropy shall be evaluated and within $\pm 0.25\text{dB}$. The sensitivity parameters (Norm X, Norm Y, and Norm Z), the diode compression parameter (DCP) and the conversion factor (Conv F) of the probe are tested. The calibration data can be referred to appendix D of this report.

2.4. Phantoms

For the measurements the Elliptical defined by the IEEE SCC-34/SC2 group is used. The phantom is a polyurethane shell integrated in a wooden table. The thickness of the phantom amounts to 2mm +/- 0.2mm. The Elliptical phantom has elliptic shape. The Elliptical phantom provide one reference point on its top part to position the probe tip correctly. The phantom set-up includes a cover, which prevents the evaporation of the liquid.



Elliptical

2.5. Technical Data

Overall thickness	2±0.2mm
Internal Dimensions (Bottom part)	600 mm (L) x 400 mm (W) 170 mm (H)
External Dimensions	1000 mm (L) x 500 mm (W) x 280 mm (H)
Maximum volume	35 L
Material	Fiberglass based
Relative permittivity	3.4
Loss tangent	0.02

The test, based on ultrasonic system, allows measuring the thickness with an accuracy of 10 µm.

2.6. Device Holder



The SAR in the phantom is approximately inversely proportional to the square of the distance between the source and the liquid surface.

Material properties: the positioning system is made of PETP. This material offers a low permittivity of 3.2 and low loss, with a loss tangent of 0.005 to minimize the influence of the DUT on measurement results.

Mechanical properties: 2 rows of rail to cover easily the surface of the phantom. The fixing plate is perfectly adapted to larger devices, such as a PC which can be positioned in all configurations.

Accuracy and precision: graduated scale available on each axis. The DUT is fixed with a specific adaptable grip.

2.7. Test Equipment List

This table gives a complete overview of the SAR measurement equipment.

Devices used during the test described are marked ☒

	Manufacturer	Name of Equipment	Type/Model	Serial Number	Calibration	
					Last Cal.	Due Date
☒	MVG	E FIELD PROBE	SSE2	0523-EPGO-403	Mar. 03, 2026	Mar. 02, 2027
☐	MVG	750 MHz Dipole	SID750	SN 2614-DIP0G750-325	Mar. 31, 2026	Mar. 30, 2029
☐	MVG	900 MHz Dipole	SID900	SN 1811-DIP0G900-151	Mar. 31, 2026	Mar. 30, 2029
☐	MVG	1800 MHz Dipole	SID1800	1811-DIP1G800-152	Mar. 31, 2026	Mar. 30, 2029
☐	MVG	1900 MHz Dipole	SID1900	1811-DIP1G900-153	Mar. 31, 2026	Mar. 30, 2029
☐	MVG	2000 MHz Dipole	SID2000	SN 1811-DIP2G000-154	Mar. 31, 2026	Mar. 30, 2029
☐	MVG	2300 MHz Dipole	SID2300	SN 1811-DIP2G300-157	Mar. 31, 2026	Mar. 30, 2029
☒	MVG	2450 MHz Dipole	SID2450	SN 1811-DIP2G450-155	Mar. 31, 2026	Mar. 30, 2029
☐	MVG	2600 MHz Dipole	SID2600	SN 2614-DIP2G600-326	Mar. 31, 2026	Mar. 30, 2029
☐	MVG	3500 MHz Dipole	SWG3500	SN 1811-DIP3G500-156	Apr. 01, 2026	Mar. 31, 2029
☒	MVG	5000 MHz Dipole	SWG5500	SN 2923-DIP5G000-730	Apr. 01, 2026	Mar. 31, 2029
☒	MVG	Liquid measurement Kit	SCLMP	SN 21/15 OCPG 72	Jul. 02, 2023	Jul. 01, 2024
					Jul. 01, 2024	Jun. 30, 2025
					Jun. 30, 2025	Jun. 29, 2026
☒	MVG	Power Amplifier	N.A	AMPLISAR_28/14_003	NCR	NCR
☒	KEITHLEY	Millivoltmeter	2000	4072790	Jul. 02, 2023	Jul. 01, 2024
					Jul. 01, 2024	Jun. 30, 2025
					Jun. 30, 2025	Jun. 29, 2026

☐	R&S	Wideband radio communication tester	CMW500	116581	Jul. 02, 2023	Jul. 01, 2024
					Jul. 01, 2024	Jun. 30, 2025
					Jun. 30, 2025	Jun. 29, 2026
☒	HP	Network Analyzer	8753D	3410J01136	Jul. 02, 2023	Jul. 01, 2024
					Jul. 01, 2024	Jun. 30, 2025
					Jun. 30, 2025	Jun. 29, 2026
☒	HP	Network Analyzer - calibration kit	N.A	3400J01116 3401J01110	Jul. 02, 2023	Jul. 01, 2024
					Jul. 01, 2024	Jun. 30, 2025
					Jun. 30, 2025	Jun. 29, 2026
☒	Agilent	PSG Analog Signal Generator	E8257D	MY51110112	Jul. 02, 2023	Jul. 01, 2024
					Jul. 01, 2024	Jun. 30, 2025
					Jun. 30, 2025	Jun. 29, 2026
☒	Agilent	Power meter	E4419B	MY45102538	Jul. 02, 2023	Jul. 01, 2024
					Jul. 01, 2024	Jun. 30, 2025
					Jun. 30, 2025	Jun. 29, 2026
☒	Agilent	Power meter	E4419B	MY45102140	Jul. 02, 2023	Jul. 01, 2024
					Jul. 01, 2024	Jun. 30, 2025
					Jun. 30, 2025	Jun. 29, 2026
☒	Agilent	Power meter	E4419B	MY45102215	Jul. 02, 2023	Jul. 01, 2024
					Jul. 01, 2024	Jun. 30, 2025

					Jun. 30, 2025	Jun. 29, 2026
☒	JFW	attenuator	50FPE-006	4360846-494-4	Jul. 02, 2023	Jul. 01, 2024
					Jul. 01, 2024	Jun. 30, 2025
					Jun. 30, 2025	Jun. 29, 2026
☒	JFW	attenuator	50FPE-006	4360846-492-1	Jul. 02, 2023	Jul. 01, 2024
					Jul. 01, 2024	Jun. 30, 2025
					Jun. 30, 2025	Jun. 29, 2026
☒	JFW	attenuator	50FPE-006	4360846-490-6	Jul. 02, 2023	Jul. 01, 2024
					Jul. 01, 2024	Jun. 30, 2025
					Jun. 30, 2025	Jun. 29, 2026
☒	Agilent	Power sensor	E9301A	MY41495644	Jul. 02, 2023	Jul. 01, 2024
					Jul. 01, 2024	Jun. 30, 2025
					Jun. 30, 2025	Jun. 29, 2026
☒	Agilent	Power sensor	E9301A	US39212148	Jul. 02, 2023	Jul. 01, 2024
					Jul. 01, 2024	Jun. 30, 2025
					Jun. 30, 2025	Jun. 29, 2026
☒	MCLI/USA	Directional Coupler	CB11-20	0D2L51502	Jul. 18, 2021	Jul. 17, 2024
					Jul. 17, 2024	Jul. 16, 2027
☒	N/A	Thermometer	N/A	LES-085	Sep. 23, 2024	Sep. 22, 2027
☒	MVG	Elliptical Phantom	SSM2	SN 20/11 ELLI20	NCR	NCR
☒	MVG	Device Holder	SMPPD	SN 24/11 LSH15	NCR	NCR

3. SAR 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 Wi-Fi/BT power measurement, use engineering software to configure EUT Wi-Fi/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 Wi-Fi/BT output power.

<SAR measurement>

- (a) Use base station simulator to configure EUT WWAN transmission in radiated connection, and engineering software to configure EUT Wi-Fi/BT continuously transmission, at maximum RF power, in the highest power channel.
- (b) Place the EUT in the positions as Appendix A demonstrates.
- (c) Set scan area, grid size and other setting on the OPENSAR 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

3.1. Power Reference

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.

3.2. Area scan & Zoom scan

The area scan is a 2D scan to find the hot spot location on the DUT. The zoom scan is a 3D scan

above the hot spot to calculate the 1g and 10g SAR value.

Measurement of the SAR distribution with a grid of 8 to 16 mm * 8 to 16 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. 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.

From the scanned SAR distribution, identify the position of the maximum SAR value, in addition identify the positions of any local maxima with SAR values within 2 dB of the maximum value that will not be within the zoom scan of other peaks; additional peaks shall be measured only when the primary peak is within 2 dB of the SAR compliance limit (e.g., 1 W/kg for 1,6 W/kg 1 g limit, or 1,26 W/kg for 2 W/kg, 10 g limit).

Area scan & Zoom scan parameters extracted from FCC KDB 865664 D01 SAR measurement 100 MHz to 6 GHz.

			≤ 3 GHz	> 3 GHz
Maximum distance from closest measurement point (geometric center of probe sensors) to phantom surface			5 ± 1 mm	$\frac{1}{2} \cdot \delta \cdot \ln(2) \pm 0.5 \text{ mm}$
Maximum probe angle from probe axis to phantom surface normal at the measurement location			30° ± 1°	20° ± 1°
Maximum area scan spatial resolution: $\Delta x_{\text{Area}}, \Delta y_{\text{Area}}$			≤ 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: $\Delta x_{\text{Zoom}}, \Delta y_{\text{Zoom}}$			≤ 2 GHz: ≤ 8 mm 2 – 3 GHz: ≤ 5 mm*	3 – 4 GHz: ≤ 5 mm* 4 – 6 GHz: ≤ 4 mm*
Maximum zoom scan spatial resolution, normal to phantom surface	uniform grid: $\Delta z_{\text{Zoom}}(n)$		≤ 5 mm	3 – 4 GHz: ≤ 4 mm 4 – 5 GHz: ≤ 3 mm 5 – 6 GHz: ≤ 2 mm
	graded grid	$\Delta z_{\text{Zoom}}(1)$: between 1 st two points closest to phantom surface	≤ 4 mm	3 – 4 GHz: ≤ 3 mm 4 – 5 GHz: ≤ 2.5 mm 5 – 6 GHz: ≤ 2 mm
		$\Delta z_{\text{Zoom}}(n>1)$: between subsequent points	≤ 1.5 · $\Delta z_{\text{Zoom}}(n-1)$	
Minimum zoom scan volume	x, y, z		≥ 30 mm	3 – 4 GHz: ≥ 28 mm 4 – 5 GHz: ≥ 25 mm 5 – 6 GHz: ≥ 22 mm
Note: δ is the penetration depth of a plane-wave at normal incidence to the tissue medium; see draft standard IEEE P1528-2011 for details.				
* When zoom scan is required and the <u>reported</u> SAR from the <u>area scan based 1-g SAR estimation</u> procedures of KDB 447498 is ≤ 1.4 W/kg, ≤ 8 mm, ≤ 7 mm and ≤ 5 mm zoom scan resolution may be applied, respectively, for 2 GHz to 3 GHz, 3 GHz to 4 GHz and 4 GHz to 6 GHz.				

3.3. 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 minimise measurements errors, but the highest local SAR will occur at the surface of the phantom.

An extrapolation is used to determine these 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 1 mm 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.

3.4. Volumetric Scan

The volumetric scan consists of a full 3D scan over a specific area. This 3D scan is useful for multi Tx SAR measurement. Indeed, it is possible with OpenSAR to add, point by point, several volumetric scans to calculate the SAR value of the combined measurement as it is defined in the standard IEEE1528 and IEC62209.

3.5. Power Drift

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

4. System Verification Procedure

4.1. Tissue Verification

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

Ingredients (% of weight)	Head Tissue									
	750	835	900	1800	1900	2000	2450	2600	5200	5800
Frequency Band (MHz)	750	835	900	1800	1900	2000	2450	2600	5200	5800
Water	34.40	34.40	34.40	55.36	55.36	57.87	57.87	57.87	65.53	65.53
NaCl	0.79	0.79	0.79	0.35	0.35	0.16	0.16	0.16	0.00	0.00
1,2-Propanediol	64.81	64.81	64.81	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Triton X-100	0.00	0.00	0.00	30.45	30.45	19.97	19.97	19.97	24.24	24.24
DGBE	0.00	0.00	0.00	13.84	13.84	22.00	22.00	22.00	10.23	10.23

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 15 cm. For head SAR testing, the liquid depth from the ear reference point (ERP) of the phantom to the liquid top surface is larger than 15 cm.



4.1.1. Tissue Dielectric Parameter Check Results

The simulating liquids should be checked at the beginning of a series of SAR measurements to determine if the dielectric parameters are within the tolerances of the specified target values. The measured conductivity and relative permittivity should be within $\pm 5\%$ of the target values.

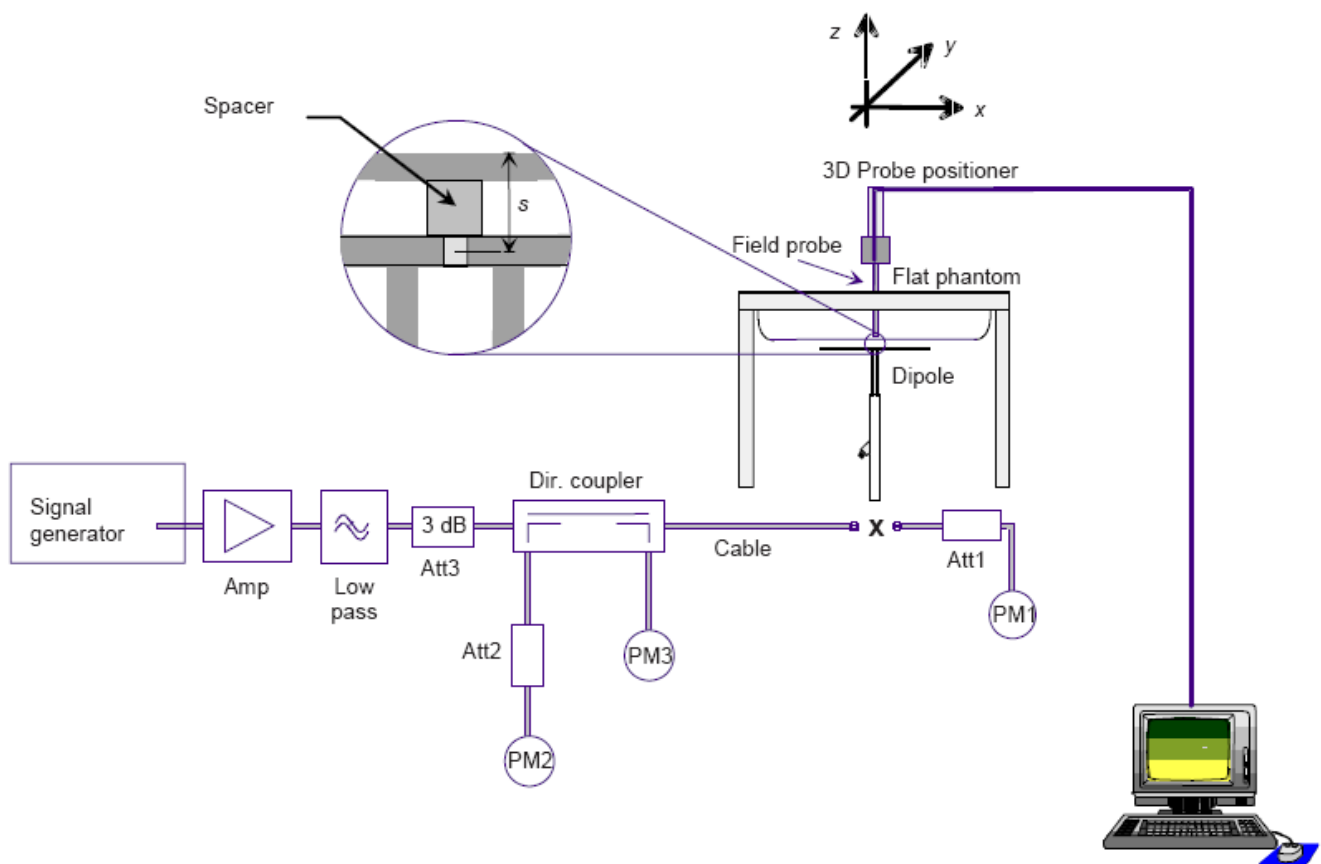
Tissue Type	Measured Frequency (MHz)	Target Tissue		Measured Tissue		Liquid Temp.	Test Date
		$\epsilon_r (\pm 5\%)$	σ (S/m) ($\pm 5\%$)	ϵ_r	σ (S/m)		
Head 2450	2450	39.20 (37.24~41.16)	1.80 (1.71~1.89)	41.04	1.80	21.1 °C	Apr. 16, 2026
Head 5200	5200	36.00 (34.20~37.80)	4.66 (4.43~4.89)	36.00	4.66	21.6 °C	Apr. 20, 2026
Head 5400	5400	35.80 (34.01~37.59)	4.86 (4.62~5.10)	35.90	4.86	21.8 °C	Apr. 23, 2026
Head 5600	5600	35.50 (33.73~37.28)	5.07 (4.82~5.32)	35.70	5.07	21.4 °C	Apr. 27, 2026
Head 5800	5800	35.30 (33.54~37.07)	5.27 (5.01~5.53)	35.50	5.27	21.5 °C	Apr. 30, 2026

NOTE: The dielectric parameters of the tissue-equivalent liquid should be measured under similar ambient conditions and within 2 °C of the conditions expected during the SAR evaluation to satisfy protocol requirements.

4.2. System Verification Procedure

The system verification is performed for verifying the accuracy of the complete measurement system and performance of the software. The dipole is connected to the signal source consisting of signal generator and amplifier via a directional coupler, N-connector cable and adaption to SMA. It is fed with a power of 100mW (below 5GHz) or 50mW (above 5GHz). To adjust this power a power meter is used. The power sensor is connected to the cable before the system verification to measure the power at this point and do adjustments at the signal generator. At the outputs of the directional coupler both return loss as well as forward power are controlled during the system verification to make sure that emitted power at the dipole is kept constant. This can also be checked by the power drift measurement after the test (result on plot).

The system verification is shown as below picture:



4.2.1. System Verification Results

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

System Verification	Power fed to reference dipole (mW)	Measured SAR Value		Measured SAR (Normalized to 1W)		Target SAR Value (1W)		Deviation (%)		Test Date
		1-g (W/Kg)	10-g (W/Kg)	1-g (W/Kg)	10-g (W/Kg)	1-g (W/Kg)	10-g (W/Kg)	1-g (W/Kg)	10-g (W/Kg)	
2450MHz	100	5.184	2.359	51.84	23.59	53.17	24.48	-2.50%	-3.64%	Apr. 16, 2026
5200MHz	50	3.678	1.203	73.56	24.06	77.82	22.53	-5.47%	6.79%	Apr. 20, 2026
5400MHz	50	3.705	1.183	74.10	23.66	78.26	22.55	-5.32%	4.92%	Apr. 23, 2026
5600MHz	50	4.106	1.201	82.12	24.02	78.55	22.77	4.54%	5.49%	Apr. 27, 2026
5800MHz	50	4.106	1.206	82.11	24.12	78.72	22.83	4.31%	5.65%	Apr. 30, 2026

5. SAR measurement variability

Per KDB865664 D01 SAR measurement 100 MHz to 6 GHz, 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 .

6. SAR Measurement Uncertainty

This uncertainty represents an expanded uncertainty expressed at approximately the 95% confidence level using a coverage factor of $k=2$.

Symbol	Uncertainty Component	Prob. Dist.	Unc. $a(x_i)$	Div. q_i	$u(x_i) = a(x_i)/q_i$	C_i	$u(y) = C_i * u(x_i)$	v_i
Measurement system errors								
CF	Probe calibration	N ($k = 2$)	5.72	2	2.86	1	2.86	∞
CF _{drift}	Probe calibration drift	R	0.15	$\sqrt{3}$	0.09	1	0.09	∞
LIN	Probe linearity and detection limit	R	1.27	$\sqrt{3}$	0.73	1	0.73	∞
BBS	Broadband signal	R	0.12	$\sqrt{3}$	0.07	1	0.07	∞
ISO	Probe isotropy	R	0.16	$\sqrt{3}$	0.09	1	0.09	∞
DAE	Other probe and data acquisition errors	N	2.4	1	2.40	1	2.40	∞
AMB	RF ambient and noise	N	3.51	1	3.51	1	3.51	∞
Δ_{xyz}	Probe positioning errors	N	1.2	1	1.20	$2/\delta$	1.20	
DAT	Data processing errors	N	2.1	1	2.10	1	2.10	∞
Phantom and device (DUT or validation antenna) errors								
LIQ(σ)	Measurement of phantom conductivity(σ)	N	4.1	1	4.1	c_ϵ, c_σ	4.10	∞
LIQ(T_c)	Temperature effects (medium)	R	2.7	$\sqrt{3}$	1.56	c_ϵ, c_σ	1.56	∞
EPS	Shell permittivity	R	2.1	$\sqrt{3}$	1.21	See 8.4.2.3	0.30	∞
DIS	Distance between the radiating element of the DUT and the phantom medium	N	0.7	1	0.7	2	1.40	∞
D _{xyz}	Repeatability of positioning the DUT or source against the phantom	N	1.2	1	1.2	1	1.20	5
H	Device holder effects	N	3.8	1	3.8	1	3.80	
MOD	Effect of operating mode on probe sensitivity	R	3.42	$\sqrt{3}$	1.97	1	1.97	∞
TAS	Time-average SAR	R	1.8	$\sqrt{3}$	1.04	1	1.04	∞
RF _{drift}	Variation in SAR due to drift in output of DUT	N	4.5	1	4.5	1	4.50	
VAL	Validation antenna uncertainty (validation measurement only)	N	1.4	1	1.4	1	1.40	
P _{in}	Uncertainty in accepted power (validation measurement only)	N	2.4	1	2.4	1	2.40	
Corrections to the SAR result (if applied)								
C(ϵ', σ)	Phantom deviation from target (ϵ', σ)	N	3.7	1	3.7	1	3.70	
C(R)	SAR scaling	R	1.8	$\sqrt{3}$	1.04	1	1.04	
u(Δ SAR)	Combined uncertainty						10.84	
U	Expanded uncertainty and effective degrees of freedom					U =	21.68	

7. RF Exposure Positions

7.1. Generic device

A typical example of a body supported device is a wireless enabled laptop device that among other orientations may be supported on the thighs of a sitting user. To represent this orientation, the device shall be positioned with its base against the flat phantom. Other orientations may be specified by the manufacturer in the user instructions. If the intended use is not specified, the device shall be tested directly against the flat phantom in all usable orientations.

The screen portion of the device shall be in an open position at a 90° angle as seen in Figure 7.1 (left side), or at an operating angle specified for intended use by the manufacturer in the operating instructions. Where a body supported device has an integral screen required for normal operation, then the screen-side will not need to be tested if the antenna(s) integrated in it ordinarily remain(s) 200 mm from the body. Where a screen mounted antenna is present, the measurement shall be performed with the screen against the flat phantom as shown in Figure 7.1) (right side), if operating the screen against the body is consistent with the intended use.

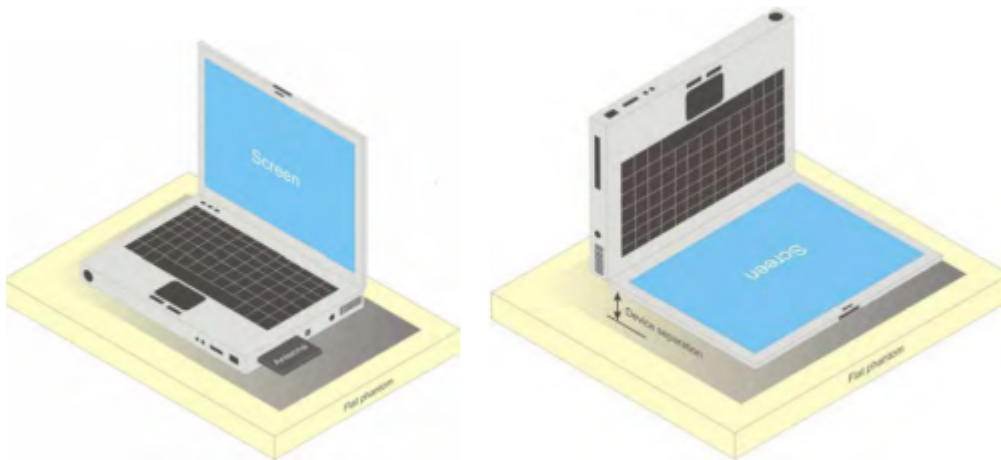


Figure 7.1 – Test positions for generic device

Note: Refer to KDB 616217 D04 SAR for laptop and tablets v01r02, When antennas are incorporated in the keyboard section of a laptop computer, SAR is required for the bottom surface of the keyboard.¹⁴ Provided tablet use conditions are not supported by the laptop computer, SAR tests for bystander exposure from the edges of the keyboard and display screen of laptop computers are generally not required.

Antenna Location



8. RF Output Power

8.1. Wi-Fi & BT Output Power

Mode	Channel	Frequency (MHz)	Tune-up (dBm)	Output Power (dBm)ANT1	Tune-up (dBm)	Output Power (dBm)ANT2	Tune-up (dBm)	Output Power (dBm)MIMO
802.11b	1	2412	14.00	13.68	14.00	13.51	/	/
	6	2437	15.00	14.06	15.00	14.21	/	/
	11	2462	14.00	13.63	14.00	13.83	/	/
802.11g	1	2412	15.00	14.70	14.00	13.81	/	/
	6	2437	14.00	13.13	14.00	13.34	/	/
	11	2462	14.00	13.68	13.00	12.97	/	/
802.11n (HT20)	1	2412	15.00	14.26	14.00	13.95	18.00	17.12
	6	2437	14.00	13.99	15.00	14.88	18.00	17.47
	11	2462	14.00	13.03	13.00	12.89	16.00	15.97
802.11n (H40)	3	2422	14.00	13.06	14.00	13.49	17.00	16.29
	6	2437	14.00	13.06	15.00	14.02	17.00	16.58
	9	2452	13.00	12.43	14.00	13.94	17.00	16.26
AX20	1	2412	15.00	14.35	15.00	14.10	18.00	17.24
	6	2437	15.00	14.85	15.00	14.87	18.00	17.87
	11	2462	15.00	14.32	14.00	13.71	18.00	17.04
AX40	3	2422	14.00	13.69	14.00	13.41	17.00	16.56
	6	2437	14.00	13.83	14.00	13.87	17.00	16.86
	9	2452	14.00	13.53	13.00	12.79	17.00	16.19

Mode	Frequency (MHz)	Tune-up (dBm)	Output Power (dBm)ANT1	Tune-up (dBm)	Output Power (dBm)ANT2	Tune-up (dBm)	Output Power (dBm)MIMO
802.11A	5180	6.00	5.82	7.00	6.08	/	/
	5200	6.00	5.84	7.00	6.20	/	/
	5240	6.00	5.26	6.00	5.79	/	/
802.11N20SISO	5180	6.00	5.21	6.00	5.35	9.00	8.29
	5200	6.00	5.09	7.00	6.79	10.00	9.03
	5240	6.00	5.65	7.00	6.20	9.00	8.94
802.11N40SISO	5190	6.00	5.06	6.00	5.97	9.00	8.55
	5230	6.00	5.68	7.00	6.53	10.00	9.14
	5180	7.00	6.09	6.00	5.52	9.00	8.82
802.11AC20SISO	5200	7.00	6.45	7.00	6.83	10.00	9.65
	5240	6.00	5.75	7.00	6.00	9.00	8.89
802.11AC40SISO	5190	6.00	5.83	6.00	5.92	9.00	8.89
	5230	6.00	5.70	7.00	6.45	10.00	9.10
802.11AC80SISO	5210	6.00	5.97	6.00	5.79	9.00	8.89
	5180	7.00	6.06	6.00	5.76	9.00	8.92
	5200	7.00	6.64	7.00	6.90	10.00	9.78
AX20	5240	7.00	6.32	7.00	6.23	10.00	9.29
	5190	6.00	5.52	6.00	5.32	9.00	8.43
	5230	6.00	5.53	7.00	6.12	9.00	8.85
AX40	5210	6.00	5.45	6.00	5.66	9.00	8.57

Mode	Frequency (MHz)	Tune-up (dBm)	Output Power (dBm)ANT1	Tune-up (dBm)	Output Power (dBm)ANT2	Tune-up (dBm)	Output Power (dBm)MIMO
802.11A	5260	7.00	6.14	7.00	6.49	/	/

	5280	6.00	5.92	6.00	5.47	/	/
	5320	7.00	6.03	6.00	5.84	/	/
802.11N20SISO	5260	6.00	5.22	6.00	5.24	9.00	8.24
	5280	6.00	5.78	7.00	6.17	9.00	8.99
	5320	6.00	5.49	7.00	6.39	9.00	8.97
802.11N40SISO	5270	6.00	5.58	6.00	5.62	9.00	8.61
	5310	6.00	5.99	6.00	5.14	9.00	8.60
802.11AC20SISO	5260	7.00	6.48	6.00	5.57	10.00	9.06
	5280	6.00	5.75	7.00	6.19	9.00	8.99
	5320	6.00	5.33	7.00	6.38	9.00	8.90
802.11AC40SISO	5270	6.00	5.73	6.00	5.31	9.00	8.54
	5310	6.00	5.05	7.00	6.38	9.00	8.78
802.11AC80SISO	5290	7.00	6.01	6.00	5.92	9.00	8.98
AX20	5260	7.00	6.59	6.00	5.44	10.00	9.06
	5280	7.00	6.05	6.00	5.89	9.00	8.98
	5320	6.00	5.48	7.00	6.94	10.00	9.28
AX40	5270	6.00	5.63	6.00	5.71	9.00	8.68
	5310	6.00	5.95	6.00	5.71	9.00	8.84
AX80	5290	6.00	5.27	6.00	5.60	9.00	8.45

Mode	Frequency (MHz)	Tune-up (dBm)	Output Power (dBm)ANT1	Tune-up (dBm)	Output Power (dBm)ANT2	Tune-up (dBm)	Output Power (dBm)MIMO
802.11A	5500	6.00	5.92	7.00	6.32	/	/
	5600	7.00	6.71	7.00	6.75	/	/
	5700	7.00	6.63	6.00	5.36	/	/
802.11N20SISO	5500	6.00	5.36	7.00	6.92	10.00	9.22
	5600	5.00	7.29	7.00	6.21	10.00	9.79
	5700	5.00	7.01	6.00	5.97	10.00	9.53
802.11N40SISO	5510	7.00	6.18	7.00	6.65	10.00	9.43
	5590	7.00	6.32	7.00	6.18	10.00	9.26
	5670	6.00	5.71	6.00	5.48	9.00	8.61
802.11AC20SISO	5500	6.00	5.22	7.00	6.94	10.00	9.17
	5600	6.00	5.09	7.00	6.20	9.00	8.69
	5700	7.00	6.84	6.00	5.84	10.00	9.38
802.11AC40SISO	5510	6.00	5.07	6.00	5.11	9.00	8.10
	5590	7.00	6.14	6.00	5.93	10.00	9.05
	5670	6.00	5.78	6.00	5.61	9.00	8.71
802.11AC80SISO	5530	7.00	6.80	7.00	6.93	10.00	9.88
	5610	7.00	6.39	6.00	5.96	10.00	9.19
AX20	5500	6.00	5.64	7.00	6.64	10.00	9.18
	5600	8.00	7.37	6.00	5.77	10.00	9.65
	5700	8.00	7.04	7.00	6.11	10.00	9.61
AX40	5510	7.00	6.32	6.00	5.87	10.00	9.11
	5590	8.00	7.29	7.00	6.72	11.00	10.02
	5670	7.00	6.43	6.00	5.17	9.00	8.86
AX80	5530	6.00	5.82	7.00	6.36	10.00	9.11
	5610	6.00	5.40	7.00	6.21	9.00	8.83

Mode	Frequency (MHz)	Tune-up (dBm)	Output Power (dBm)ANT1	Tune-up (dBm)	Output Power (dBm)ANT2	Tune-up (dBm)	Output Power (dBm)MIMO
802.11A	5745	7.00	6.08	7.00	6.02	/	/
	5785	6.00	5.37	6.00	5.19	/	/
	5825	7.00	6.16	6.00	5.75	/	/
802.11N20SISO	5745	7.00	6.49	7.00	6.42	10.00	9.47
	5785	6.00	5.63	6.00	5.42	9.00	8.54
	5825	6.00	5.81	6.00	5.60	9.00	8.72

802.11N40SISO	5755	7.00	6.32	7.00	6.94	10.00	9.65
	5795	6.00	5.25	6.00	5.79	9.00	8.54
802.11AC20SISO	5745	7.00	6.24	7.00	6.42	10.00	9.34
	5785	6.00	5.77	6.00	5.72	9.00	8.76
	5825	6.00	5.16	6.00	5.59	9.00	8.39
802.11AC40SISO	5755	7.00	6.31	7.00	6.15	10.00	9.24
	5795	6.00	5.31	6.00	5.78	9.00	8.56
802.11AC80SISO	5775	6.00	5.86	7.00	6.28	10.00	9.09
AX20	5745	8.00	7.08	7.00	6.94	11.00	10.02
	5785	7.00	6.58	6.00	5.86	10.00	9.25
	5825	6.00	5.10	6.00	5.40	9.00	8.26
AX40	5755	6.00	5.80	6.00	5.93	9.00	8.88
	5795	7.00	6.27	7.00	6.52	10.00	9.41
AX80	5775	6.00	5.49	6.00	5.00	9.00	8.26

BR+EDR	Output Power (dBm)				
	Channel	Tune-up (dBm)	Data Rates		
			1M	2M	3M
	0CH	5.00	4.70	4.32	4.51
	39CH	5.00	4.97	4.78	4.86
	78CH	4.00	3.98	3.72	3.74

BLE1M	Channel	Tune-up (dBm)	Output Power (dBm)
	0CH	3.00	2.25
	19CH	3.00	2.54
	39CH	2.00	1.45

BLE2M	Channel	Tune-up (dBm)	Output Power (dBm)
	0CH	3.00	2.55
	19CH	3.00	2.86
	39CH	2.00	1.77

9. Stand-alone SAR test exclusion

Refer to FCC KDB 447498D01, the 1-g SAR 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.

Mode	Pmax (dBm)	Pmax (mW)	Distance (mm)	f (GHz)	Calculation Result	SAR Exclusion threshold	SAR test exclusion
Bluetooth	5.00	3.16	5	2.480	1.0	3	Yes

NOTE: Standalone SAR test exclusion for Bluetooth.

When standalone SAR test exclusion applies to an antenna that transmits simultaneously with other antennas, the standalone SAR must be estimated according to following to determine simultaneous transmission SAR test exclusion:

$[(\text{max. power of channel, including tune-up tolerance, mW})/(\text{min. test separation distance, mm})] \cdot [\sqrt{f(\text{GHz})}/x] \text{ W/kg}$ for test separation distances ≤ 50 mm, where $x = 7.5$ for 1-g SAR and $x = 18.75$ for 10-g SAR.

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

Mode	Position	Pmax (dBm)	Pmax (mW)	Distance (mm)	f (GHz)	x	Estimated SAR (W/kg)
Bluetooth	Body	5.00	3.16	5	2.480	7.5	0.132

NOTE: Estimated SAR calculation for Bluetooth

10. SAR Measurement Results

< WLAN 2.4G ANT1 >

Test Position of Body with 0mm	Test channel /Freq.	Mode	SAR Value (W/kg)		Power Drift (±5%)	Conducted power (dBm)	Tune-up power (dBm)	Scaled SAR 1g (W/Kg)	Date	Plot
			1g	10g						
back of screen	6/2437	802.11b	0.348	0.191	-1.98	14.06	15.00	0.432	2026/4/16	#10
back of screen	6/2437	AX20	0.345	0.187	0.14	14.85	15.00	0.357	2026/4/16	

< WLAN 2.4G ANT2 >

Test Position of Body with 0mm	Test channel /Freq.	Mode	SAR Value (W/kg)		Power Drift (±5%)	Conducted power (dBm)	Tune-up power (dBm)	Scaled SAR 1g (W/Kg)	Date	Plot
			1g	10g						
back of screen	6/2437	802.11b	0.275	0.158	-1.22	14.21	15.00	0.330	2026/4/16	#9
back of screen	6/2437	802.11n (HT20)	0.272	0.155	0.17	14.88	15.00	0.280	2026/4/16	

< WLAN 5.2G ANT1 >

Test Position of Body with 0mm	Test channel /Freq.	Mode	SAR Value (W/kg)		Power Drift (±5%)	Conducted power (dBm)	Tune-up power (dBm)	Scaled SAR 1g (W/Kg)	Date	Plot
			1g	10g						
back of screen	40/5200	AX20	0.551	0.341	3.66	6.64	7.00	0.599	2026/4/20	#1

< WLAN 5.2G ANT2 >

Test Position of Body with 0mm	Test channel /Freq.	Mode	SAR Value (W/kg)		Power Drift (±5%)	Conducted power (dBm)	Tune-up power (dBm)	Scaled SAR 1g (W/Kg)	Date	Plot
			1g	10g						
back of screen	40/5200	AX20	0.594	0.365	-3.67	6.90	7.00	0.608	2026/4/20	#2

< WLAN 5.3G ANT1 >

Test Position of Body with 0mm	Test channel /Freq.	Mode	SAR Value (W/kg)		Power Drift (±5%)	Conducted power (dBm)	Tune-up power (dBm)	Scaled SAR 1g (W/Kg)	Date	Plot
			1g	10g						
back of screen	52/5260	AX20	0.490	0.278	1.04	6.59	7.00	0.539	2026/4/23	#3

< WLAN 5.3G ANT2 >

Test Position of Body with 0mm	Test channel /Freq.	Mode	SAR Value (W/kg)		Power Drift (±5%)	Conducted power (dBm)	Tune-up power (dBm)	Scaled SAR 1g (W/Kg)	Date	Plot
			1g	10g						