

FCC SAR Test Report

Report No. : SAR20260602B001

Applicant : PIKO Spielwaren GmbH

Address : Lutherstrasse 30 96515 Sonneberg Thuringia Germany

Manufacturer : PIKO Spielwaren GmbH

Address : Lutherstrasse 30 96515 Sonneberg Thuringia Germany

Product : SmartController wlan

FCC ID : 2ATRN-55823

Brand : PIKO

Model No. : 55823 / 35051

Standards : FCC 47 CFR Part 2 (2.1093) / IEEE C95.1:1992 / IEEE 1528:2013
KDB 865664 D01 v01r04 / KDB 865664 D02 v01r02 / KDB 248227 D01 v02r02
KDB 447498 D04 v01

Sample Received Date : Oct. 13, 2023

Date of Testing : Oct. 13, 2023 ~ Oct. 16, 2023

FCC Designation No. : CN1429 FCC Site Registration No. : 646781

CERTIFICATION: The above equipment have been tested by **Boomwave Test (Shenzhen) Co., Ltd.**, and found compliance with the requirement of the above standards. The test record, data evaluation & Equipment Under Test (EUT) configurations represented herein are true and accurate accounts of the measurements of the sample's SAR characteristics under the conditions specified in this report. It should not be reproduced except in full, without the written approval of our laboratory. The client should not use it to claim product certification, approval, or endorsement by A2LA or any government agencies.

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Table of Contents

Release Control Record	3
1. Summary of Maximum SAR Value	4
2. Description of Equipment Under Test	5
3. SAR Measurement System	6
3.1 Definition of Specific Absorption Rate (SAR)	6
3.2 SPEAG DASY System	6
3.2.1 Robot	7
3.2.2 Probes	8
3.2.3 Data Acquisition Electronics (DAE)	8
3.2.4 Phantoms	9
3.2.5 Device Holder	10
3.2.6 System Validation Dipoles	10
3.2.7 Tissue Simulating Liquids	11
3.3 SAR System Verification	13
3.4 SAR Measurement Procedure	14
3.4.1 Area & Zoom Scan Procedure	14
3.4.2 Volume Scan Procedure	14
3.4.3 Power Drift Monitoring	15
3.4.4 Spatial Peak SAR Evaluation	15
3.4.5 SAR Averaged Methods	15
4. SAR Measurement Evaluation	16
4.1 EUT Configuration and Setting	16
4.2 EUT Testing Position	18
4.2.1 Body Exposure Conditions	18
4.3 Tissue Verification	18
4.4 System Verification	18
4.5 Maximum Output Power	19
4.5.1 Maximum Conducted Power	19
4.5.2 Measured Conducted Power Result	19
4.6 SAR Testing Results	20
4.6.1 SAR Test Reduction Considerations	20
4.6.2 SAR Results for Body Exposure Condition (Separation Distance is 0 cm Gap)	21
4.6.3 SAR Measurement Variability	21
5. Calibration of Test Equipment	22
6. Measurement Uncertainty	23
7. Information on the Testing Laboratories	24
Appendix A. SAR Plots of System Verification	
Appendix B. SAR Plots of SAR Measurement	
Appendix C. Calibration Certificate for Probe and Dipole	
Appendix D. Photographs of EUT and Setup	

Release Control Record

Report No.	Reason for Change	Date Issued
SAR20260602B001	Initial release	June. 02, 2026

Note:

1. This report is an updated version of the original one. It has added model number 35051 to the original report.
2. all the models are electrical identical including the same hardware design (i.e., circuit design, PCB Layout, RF module/circuit, antenna type(s) and antenna location, components on PCB, etc.), Their differences are model name, color and the new model has an additional keypad due to trading purpose. For details, please refer to the "Product Similarity Declaration" document provided by the manufacturer.
3. Since the changed part is more than 25mm away from the antenna and the changed part does not affect the electrical and RF parameters, the test data are entirely referenced from the original report. (Original report number: W7L-P23100006SA01, FCC ID: 2ATRN-55823; issued by: BV 7LAYERS COMMUNICATIONS TECHNOLOGY (SHENZHEN) CO. LTD.).

1. Summary of Maximum SAR Value

Equipment Class	Mode	Highest Reported Body SAR _{1g} (0 cm Gap) (W/kg)
DTS	2.4G WLAN	0.68

Note:

1. The SAR limit (**Head & Body: SAR_{1g} 1.6 W/kg, Extremity: SAR_{10g} 4.0 W/kg**) for general population / uncontrolled exposure is specified in FCC 47 CFR part 1 (1.1310) and ANSI/IEEE C95.1-1992.

2. Description of Equipment Under Test

EUT Type	SmartController wlan
FCC ID	2ATRN-55823
Brand Name	PIKO
Model Name	55823 / 35051
HW Version	V1.0
SW Version	V1.0
Tx Frequency Bands (Unit: MHz)	WLAN : 2412 ~ 2462
Uplink Modulations	802.11b : DSSS 802.11g/n : OFDM
Maximum Tune-up Conducted Power (Unit: dBm)	Please refer to section 4.5.1 of this report.
Antenna Type	PCB Antenna
EUT Stage	Identical Prototype

Note:

1. The above EUT information is declared by manufacturer and for more detailed features description please refers to the manufacturer's specifications or User's Manual.

3. SAR Measurement System

3.1 Definition of Specific Absorption Rate (SAR)

SAR is related to the rate at which energy is absorbed per unit mass in an object exposed to a radio field. The SAR distribution in a biological body is complicated and is usually carried out by experimental techniques or numerical modeling. The standard recommends limits for two tiers of groups, occupational/controlled and general population/uncontrolled, based on a person's awareness and ability to exercise control over his or her exposure. In general, occupational/controlled exposure limits are higher than the limits for general population/uncontrolled.

The SAR definition is the time derivative (rate) of the incremental energy (dW) absorbed by (dissipated in) an incremental mass (dm) contained in a volume element (dv) of a given density (ρ). The equation description is as below:

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

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

SAR measurement can be related to the electrical field in the tissue by

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

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

3.2 SPEAG DASY System

DASY system consists of high precision robot, probe alignment sensor, phantom, robot controller, controlled measurement server and near-field probe. The robot includes six axes that can move to the precision position of the DASY5 software defined. The DASY software can define the area that is detected by the probe. The robot is connected to controlled box. Controlled measurement server is connected to the controlled robot box. The DAE includes amplifier, signal multiplexing, AD converter, offset measurement and surface detection. It is connected to the Electro-optical coupler (ECO). The ECO performs the conversion from the optical into digital electric signal of the DAE and transfers data to the PC.

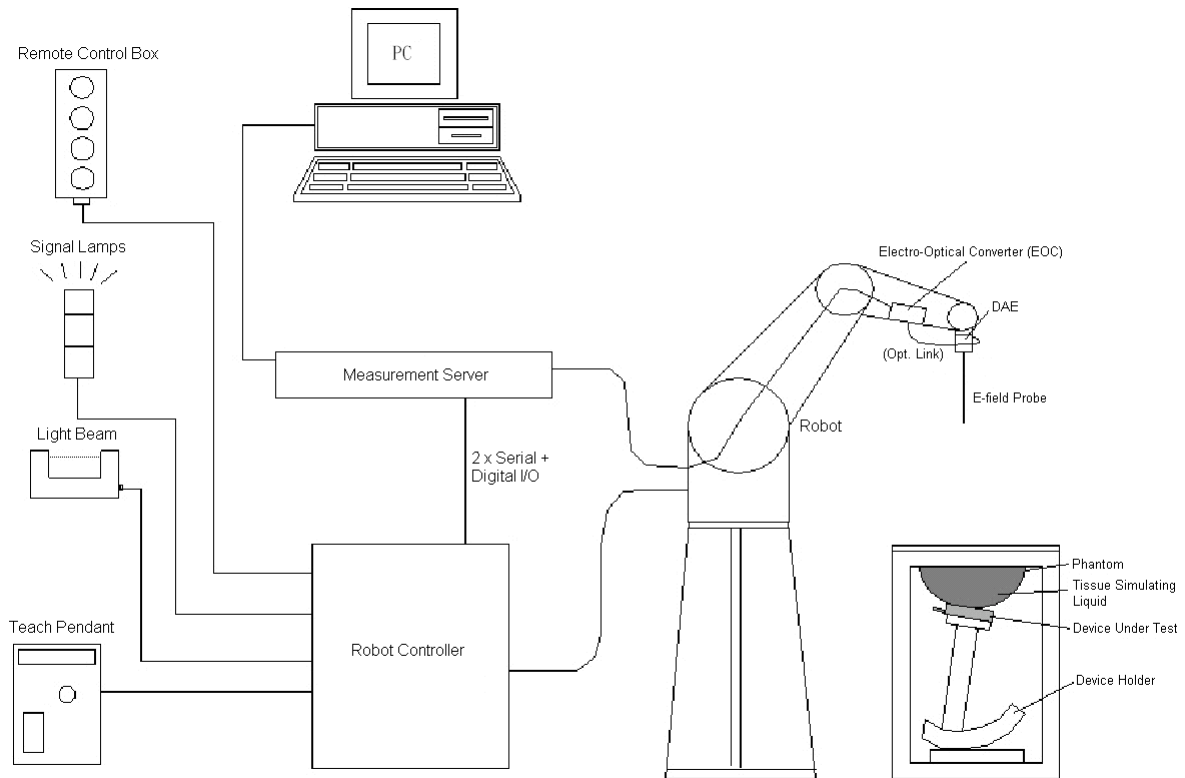


Fig-3.1 DASY System Setup

3.2.1 Robot

The DASY system uses the high precision robots from Stäubli SA (France). For the 6-axis controller system, the robot controller version (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-3.2 DASY5

3.2.2 Probes

The SAR measurement is conducted with the dosimetric probe. 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.

Model	EX3DV4	
Construction	Symmetrical design with triangular core. Built-in shielding against static charges. PEEK enclosure material (resistant to organic solvents, e.g., DGBE).	
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 μ W/g to 100 mW/g Linearity: ± 0.2 dB (noise: typically < 1 μ W/g)	
Dimensions	Overall length: 337 mm (Tip: 20 mm) Tip diameter: 2.5 mm (Body: 12 mm) Typical distance from probe tip to dipole centers: 1 mm	

Model	ES3DV3	
Construction	Symmetrical design with triangular core. Interleaved sensors. Built-in shielding against static charges. PEEK enclosure material (resistant to organic solvents, e.g., DGBE).	
Frequency	10 MHz to 4 GHz Linearity: ± 0.2 dB	
Directivity	± 0.2 dB in HSL (rotation around probe axis) ± 0.3 dB in tissue material (rotation normal to probe axis)	
Dynamic Range	5 μ W/g to 100 mW/g Linearity: ± 0.2 dB	
Dimensions	Overall length: 337 mm (Tip: 20 mm) Tip diameter: 3.9 mm (Body: 12 mm) Distance from probe tip to dipole centers: 2.0 mm	

3.2.3 Data Acquisition Electronics (DAE)

Model	DAE3, DAE4	
Construction	Signal amplifier, multiplexer, A/D converter and control logic. Serial optical link for communication with DASY embedded system (fully remote controlled). Two step probe touch detector for mechanical surface detection and emergency robot stop.	
Measurement Range	-100 to +300 mV (16 bit resolution and two range settings: 4mV, 400mV)	
Input Offset Voltage	$< 5\mu$ V (with auto zero)	
Input Bias Current	< 50 fA	
Dimensions	60 x 60 x 68 mm	

3.2.4 Phantoms

Model	Twin SAM	
Construction	The shell corresponds to the specifications of the Specific Anthropomorphic Mannequin (SAM) phantom defined in IEEE 1528 and IEC 62209-1. It enables the dosimetric evaluation of left and right hand phone usage as well as body mounted usage at the flat phantom region. A cover prevents evaporation of the liquid. Reference markings on the phantom allow the complete setup of all predefined phantom positions and measurement grids by teaching three points with the robot.	
Material	Vinylester, glass fiber reinforced (VE-GF)	
Shell Thickness	2 ± 0.2 mm (6 ± 0.2 mm at ear point)	
Dimensions	Length: 1000 mm Width: 500 mm Height: adjustable feet	
Filling Volume	approx. 25 liters	

Model	ELI	
Construction	Phantom for compliance testing of handheld and body-mounted wireless devices in the frequency range of 30 MHz to 6 GHz. ELI is fully compatible with the IEC 62209-2 standard and all known tissue simulating liquids. ELI has been optimized regarding its performance and can be integrated into our standard phantom tables. A cover prevents evaporation of the liquid. Reference markings on the phantom allow installation of the complete setup, including all predefined phantom positions and measurement grids, by teaching three points. The phantom is compatible with all SPEAG dosimetric probes and dipoles.	
Material	Vinylester, glass fiber reinforced (VE-GF)	
Shell Thickness	2.0 ± 0.2 mm (bottom plate)	
Dimensions	Major axis: 600 mm Minor axis: 400 mm	
Filling Volume	approx. 30 liters	

3.2.5 Device Holder

Model	Mounting Device	
Construction	In combination with the Twin SAM Phantom or ELI4, the Mounting Device enables the rotation of the mounted transmitter device in spherical coordinates. Rotation point is the ear opening point. Transmitter devices can be easily and accurately positioned according to IEC, IEEE, FCC or other specifications. The device holder can be locked for positioning at different phantom sections (left head, right head, flat).	
Material	POM	

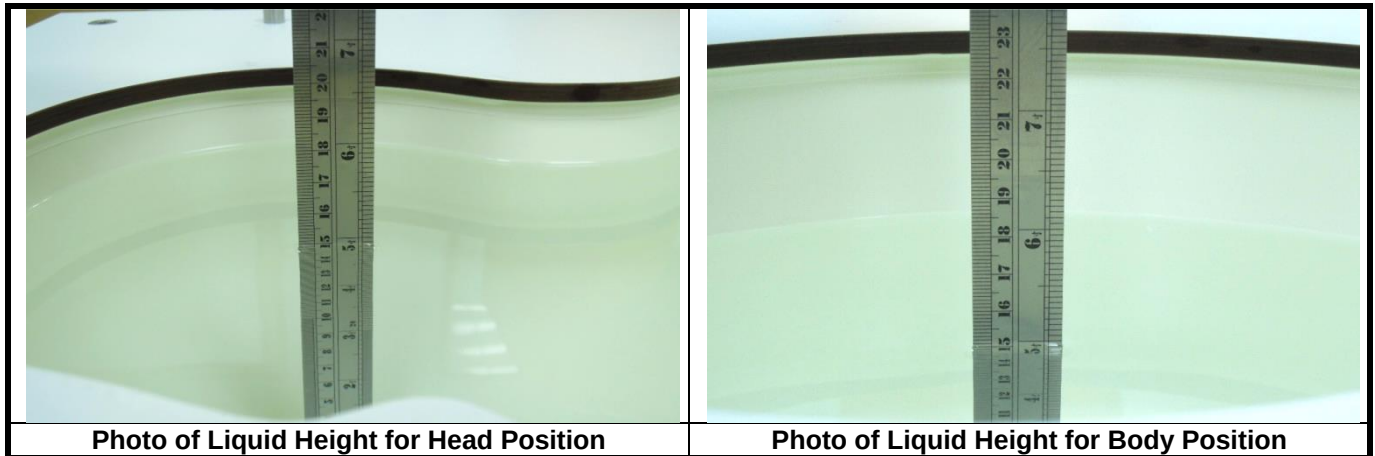
Model	Laptop Extensions Kit	
Construction	Simple but effective and easy-to-use extension for Mounting Device that facilitates the testing of larger devices according to IEC 62209-2 (e.g., laptops, cameras, etc.). It is lightweight and fits easily on the upper part of the Mounting Device in place of the phone positioner.	
Material	POM, Acrylic glass, Foam	

3.2.6 System Validation Dipoles

Model	D-Serial	
Construction	Symmetrical dipole with 1/4 balun. Enables measurement of feed point impedance with NWA. Matched for use near flat phantoms filled with tissue simulating solutions.	
Frequency	750 MHz to 5800 MHz	
Return Loss	> 20 dB	
Power Capability	> 100 W (f < 1GHz), > 40 W (f > 1GHz)	

3.2.7 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 15 cm. For head SAR testing, the liquid height from the ear reference point (ERP) of the phantom to the liquid top surface is larger than 15 cm. For body SAR testing, the liquid height from the center of the flat phantom to the liquid top surface is larger than 15 cm. The nominal dielectric values of the tissue simulating liquids in the phantom and the tolerance of 5% are listed in Table-3.1.



The dielectric properties of the head tissue simulating liquids are defined in IEEE 1528, and KDB 865664 D01 Appendix A. The dielectric properties of the tissue simulating liquids were verified prior to the SAR evaluation using a dielectric assessment kit and a network analyzer.

Table-3.1 Targets of Tissue Simulating Liquid

Frequency (MHz)	Target Permittivity	Range of $\pm 5\%$	Target Conductivity	Range of $\pm 5\%$
For Head				
750	41.9	39.8 ~ 44.0	0.89	0.85 ~ 0.93
835	41.5	39.4 ~ 43.6	0.90	0.86 ~ 0.95
900	41.5	39.4 ~ 43.6	0.97	0.92 ~ 1.02
1450	40.5	38.5 ~ 42.5	1.20	1.14 ~ 1.26
1640	40.3	38.3 ~ 42.3	1.29	1.23 ~ 1.35
1750	40.1	38.1 ~ 42.1	1.37	1.30 ~ 1.44
1800	40.0	38.0 ~ 42.0	1.40	1.33 ~ 1.47
1900	40.0	38.0 ~ 42.0	1.40	1.33 ~ 1.47
2000	40.0	38.0 ~ 42.0	1.40	1.33 ~ 1.47
2300	39.5	37.5 ~ 41.5	1.67	1.59 ~ 1.75
2450	39.2	37.2 ~ 41.2	1.80	1.71 ~ 1.89
2600	39.0	37.1 ~ 41.0	1.96	1.86 ~ 2.06
3500	37.9	36.0 ~ 39.8	2.91	2.76 ~ 3.06
5200	36.0	34.2 ~ 37.8	4.66	4.43 ~ 4.89
5300	35.9	34.1 ~ 37.7	4.76	4.52 ~ 5.00
5500	35.6	33.8 ~ 37.4	4.96	4.71 ~ 5.21
5600	35.5	33.7 ~ 37.3	5.07	4.82 ~ 5.32
5800	35.3	33.5 ~ 37.1	5.27	5.01 ~ 5.53

The following table gives the recipes for tissue simulating liquids.

Table-3.2 Recipes of Tissue Simulating Liquid

Tissue Type	Bactericide	DGBE	HEC	NaCl	Sucrose	Triton X-100	Water	Diethylene Glycol Mono-hexylether
H750	0.2	-	0.2	1.5	56.0	-	42.1	-
H835	0.2	-	0.2	1.5	57.0	-	41.1	-
H900	0.2	-	0.2	1.4	58.0	-	40.2	-
H1450	-	43.3	-	0.6	-	-	56.1	-
H1640	-	45.8	-	0.5	-	-	53.7	-
H1750	-	47.0	-	0.4	-	-	52.6	-
H1800	-	44.5	-	0.3	-	-	55.2	-
H1900	-	44.5	-	0.2	-	-	55.3	-
H2000	-	44.5	-	0.1	-	-	55.4	-
H2300	-	44.9	-	0.1	-	-	55.0	-
H2450	-	45.0	-	0.1	-	-	54.9	-
H2600	-	45.1	-	0.1	-	-	54.8	-
H3500	-	8.0	-	0.2	-	20.0	71.8	-
H5G	-	-	-	-	-	17.2	65.5	17.3

3.3 SAR System Verification

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.

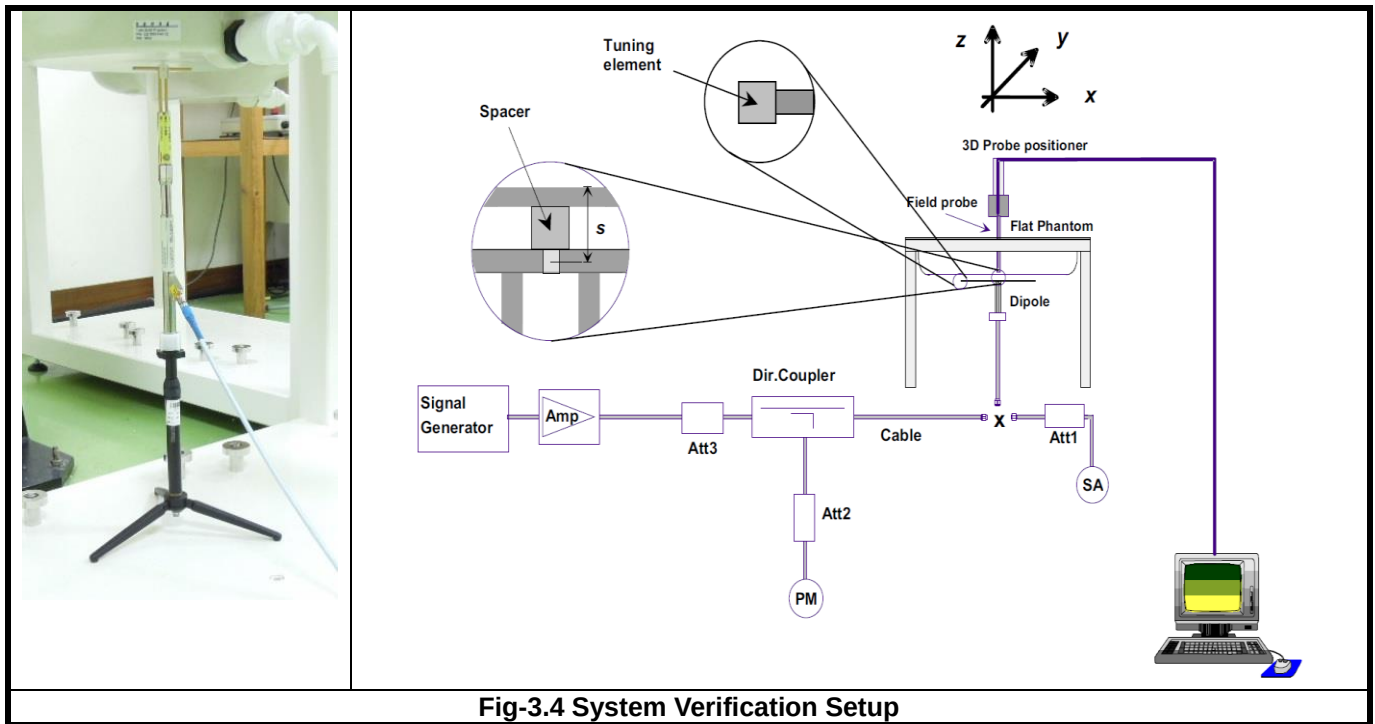


Fig-3.4 System Verification Setup

The validation dipole is placed beneath the flat phantom with the specific spacer in place. The distance spacer is touch the phantom surface with a light pressure at the reference marking and be oriented parallel to the long side of the phantom. The spectrum analyzer measures the forward power at the location of the system check dipole connector. The signal generator is adjusted for the desired forward power (250 mW is used for 700 MHz to 3 GHz, 100 mW is used for 3.5 GHz to 6 GHz) at the dipole connector and the power meter is read at that level. After connecting the cable to the dipole, the signal generator is readjusted for the same reading at power meter.

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 %.

3.4 SAR Measurement Procedure

According to the SAR 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

The SAR measurement procedures for each of test conditions are as follows:

- (a) Make EUT to transmit maximum output power
- (b) Measure conducted output power through RF cable
- (c) Place the EUT in the specific position of phantom
- (d) Perform SAR testing steps on the DASY system
- (e) Record the SAR value

3.4.1 Area & Zoom Scan Procedure

First Area Scan is used to locate the approximate location(s) of the local peak SAR value(s). The measurement grid within an Area Scan is defined by the grid extent, grid step size and grid offset. Next, in order to determine the EM field distribution in a three-dimensional spatial extension, Zoom Scan is required. The Zoom Scan is performed around the highest E-field value to determine the averaged SAR-distribution over 10 g. According to KDB 865664 D01, the resolution for Area and Zoom scan is specified in the table below.

Items	<= 2 GHz	2-3 GHz	3-4 GHz	4-5 GHz	5-6 GHz
Area Scan ($\Delta x, \Delta y$)	<= 15 mm	<= 12 mm	<= 12 mm	<= 10 mm	<= 10 mm
Zoom Scan ($\Delta x, \Delta y$)	<= 8 mm	<= 5 mm	<= 5 mm	<= 4 mm	<= 4 mm
Zoom Scan (Δz)	<= 5 mm	<= 5 mm	<= 4 mm	<= 3 mm	<= 2 mm
Zoom Scan Volume	>= 30 mm	>= 30 mm	>= 28 mm	>= 25 mm	>= 22 mm

Note:

When zoom scan is required and report SAR is <= 1.4 W/kg, the zoom scan resolution of $\Delta x / \Delta y$ (2-3GHz: <= 8 mm, 3-4GHz: <= 7 mm, 4-6GHz: <= 5 mm) may be applied.

3.4.2 Volume Scan Procedure

The volume scan is used for assess overlapping SAR distributions for antennas transmitting in different frequency bands. It is equivalent to an oversized zoom scan used in standalone measurements. The measurement volume will be used to enclose all the simultaneous transmitting antennas. For antennas transmitting simultaneously in different frequency bands, the volume scan is measured separately in each frequency band. In order to sum correctly to compute the 1g aggregate SAR, the EUT remain in the same test position for all measurements and all volume scan use the same spatial resolution and grid spacing. When all volume scan were completed, the software, SEMCAD postprocessor can combine and subsequently superpose these measurement data to calculating the multiband SAR.

3.4.3 Power Drift Monitoring

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

3.4.4 Spatial Peak SAR Evaluation

The procedure for spatial peak SAR evaluation has been implemented according to the test standard. It can be conducted for 1g and 10g, as well as for user-specific masses. The DASY software includes all numerical procedures necessary to evaluate the spatial peak SAR value.

The base for the evaluation is a "cube" measurement. The measured volume must include the 1g and 10g cubes with the highest averaged SAR values. For that purpose, the center of the measured volume is aligned to the interpolated peak SAR value of a previously performed area scan.

The entire evaluation of the spatial peak values is performed within the post-processing engine (SEMCAD). The system always gives the maximum values for the 1g and 10g cubes. The algorithm to find the cube with highest averaged SAR is divided into the following stages:

- (a) Extraction of the measured data (grid and values) from the Zoom Scan
- (b) Calculation of the SAR value at every measurement point based on all stored data (A/D values and measurement parameters)
- (c) Generation of a high-resolution mesh within the measured volume
- (d) Interpolation of all measured values from the measurement grid to the high-resolution grid
- (e) Extrapolation of the entire 3-D field distribution to the phantom surface over the distance from sensor to surface
- (f) Calculation of the averaged SAR within masses of 1g and 10g

3.4.5 SAR Averaged Methods

In DASY, the interpolation and extrapolation are both based on the modified Quadratic Shepard'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.

4. SAR Measurement Evaluation

4.1 EUT Configuration and Setting

<Considerations Related to WLAN for Setup and Testing>

In general, various vendor specific external test software and chipset based internal test modes are typically used for SAR measurement. These chipset based test mode utilities are generally hardware and manufacturer dependent, and often include substantial flexibility to reconfigure or reprogram a device. 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. 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. The reported SAR must be scaled to 100% transmission duty factor to determine compliance at the maximum tune-up tolerance limit.

According to KDB 248227 D01, this device has installed WLAN engineering testing software which can provide continuous transmitting RF signal. During WLAN SAR testing, this device was operated to transmit continuously at the maximum transmission duty with specified transmission mode, operating frequency, lowest data rate, and maximum output power.

Initial Test Configuration

An initial test configuration is determined for OFDM transmission modes in 2.4 GHz and 5 GHz bands according to the channel bandwidth, modulation and data rate combination(s) with the highest maximum output power specified for production units in each standalone and aggregated frequency band. When the same maximum power is specified for multiple transmission modes in a frequency band, the largest channel bandwidth, lowest order modulation, lowest data rate and lowest order 802.11a/g/n/ac mode is used for SAR measurement, on the highest measured output power channel in the initial test configuration, for each frequency band.

Subsequent Test Configuration

SAR measurement requirements for the remaining 802.11 transmission mode configurations that have not been tested in the initial test configuration are determined separately for each standalone and aggregated frequency band, in each exposure condition, according to the maximum output power specified for production units. Additional power measurements may be required to determine if SAR measurements are required for subsequent highest output power channels in a subsequent test configuration. When the highest reported SAR for the initial test configuration according to the initial test position or fixed exposure position requirements, is adjusted by the ratio of the subsequent test configuration to initial test configuration specified maximum output power and the adjusted SAR is ≤ 1.2 W/kg, SAR is not required for that subsequent test configuration.

SAR Test Configuration and Channel Selection

When multiple channel bandwidth configurations in a frequency band have the same specified maximum output power, the initial test configuration is using largest channel bandwidth, lowest order modulation, lowest data rate, and lowest order 802.11 mode (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.

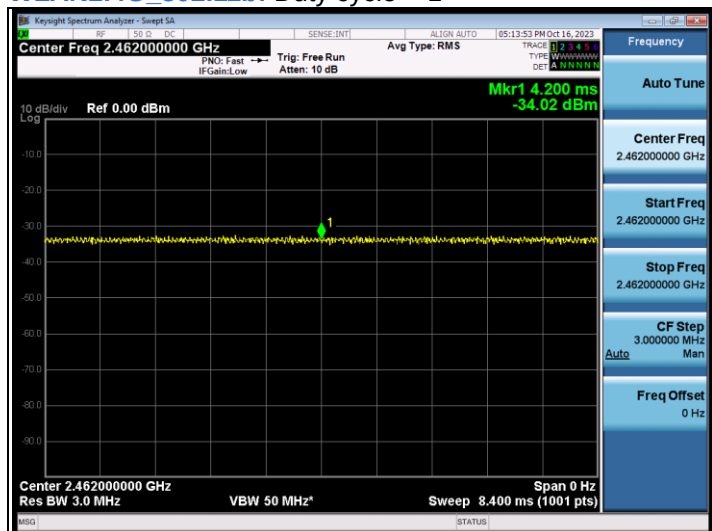
- 1) The channel closest to mid-band frequency is selected for SAR measurement.
- 2) For channels with equal separation from mid-band frequency; for example, high and low channels or two mid-band channels, the higher frequency (number) channel is selected for SAR measurement.

<Considerations Related to Bluetooth for Setup and Testing>

This device has installed Bluetooth engineering testing software which can provide continuous transmitting RF signal. During Bluetooth SAR testing, this device was operated to transmit continuously at the maximum transmission duty with specified transmission mode, operating frequency, lowest data rate, and maximum output power.

<Duty Cycle of Test Signal>

WLAN2.4G_802.11b: Duty cycle = 1



4.2 EUT Testing Position

4.2.1 Body Exposure Conditions

This EUT was tested for all the close to the human body of intended use surfaces of the EUT. The separation distance between this EUT and phantom is 0 cm.

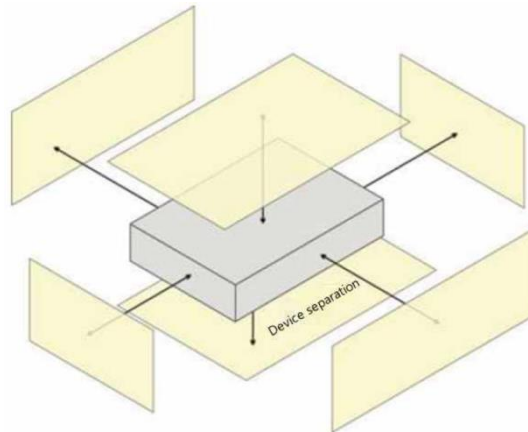


Fig-4.1 Illustration for Body Position

4.3 Tissue Verification

The measuring results for tissue simulating liquid are shown as below.

Test Date	Tissue Type	Frequency (MHz)	Liquid Temp. (°C)	Measured Conductivity (σ)	Measured Permittivity (ϵ_r)	Target Conductivity (σ)	Target Permittivity (ϵ_r)	Conductivity Deviation (%)	Permittivity Deviation (%)
Oct. 16, 2023	Head	2450	22.7	1.854	37.997	1.80	39.20	3.00	-3.07

Note:

The dielectric properties of the tissue simulating liquid must be measured within 24 hours before the SAR testing and within $\pm 5\%$ of the target values. Liquid temperature during the SAR testing must be within $\pm 2^\circ\text{C}$.

4.4 System Verification

The measuring result for system verification is tabulated as below.

Test Date	Mode	Frequency (MHz)	1W Target SAR-1g (W/kg)	Measured SAR-1g (W/kg)	Normalized to 1W SAR-1g (W/kg)	Deviation (%)	Dipole S/N	Probe S/N	DAE S/N
Oct. 16, 2023	Head	2450	53.60	12.70	50.80	-5.22	893	3873	1389

Note:

Comparing to the reference SAR value provided by SPEAG, the validation data should be within its specification of 10 %. The result indicates the system check can meet the variation criterion and the plots can be referred to Appendix A of this report.

4.5 Maximum Output Power

4.5.1 Maximum Conducted Power

The maximum conducted average power (Unit: dBm) including tune-up tolerance is shown as below.

2.4GHz WLAN	Mode	Channel	Frequency (MHz)	Tune Up Limit (dBm)
	802.11b 1Mbps	1	2412	19.50
		6	2437	18.50
		11	2462	19.50
	802.11g 6Mbps	1	2412	18.00
		6	2437	18.00
		11	2462	18.00
	802.11n-HT20 MCS0	1	2412	16.00
		6	2437	15.00
		11	2462	16.00
	802.11n-HT40 MCS0	3	2422	15.00
		6	2437	15.00
		9	2452	15.00

4.5.2 Measured Conducted Power Result

The measuring conducted average power (Unit: dBm) is shown as below.

2.4GHz WLAN	Mode	Channel	Frequency (MHz)	Average power (dBm)
	802.11b 1Mbps	1	2412	18.703
		6	2437	17.510
		11	2462	18.787
	802.11g 6Mbps	1	2412	17.602
		6	2437	16.718
		11	2462	17.877
	802.11n-HT20 MCS0	1	2412	14.878
		6	2437	13.528
		11	2462	15.260
	802.11n-HT40 MCS0	3	2422	14.042
		6	2437	13.073
		9	2452	13.659

4.6 SAR Testing Results

4.6.1 SAR Test Reduction Considerations

<KDB 447498 D04, General RF Exposure Guidance>

Testing of other required channels within the operating mode of a frequency band is not required when the reported SAR for the mid-band or highest output power channel is:

- (1) ≤ 0.8 W/kg or 2.0 W/kg, for 1-g or 10-g respectively, when the transmission band is ≤ 100 MHz
- (2) ≤ 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
- (3) ≤ 0.4 W/kg or 1.0 W/kg, for 1-g or 10-g respectively, when the transmission band is ≥ 200 MHz

<KDB 248227 D01, SAR Guidance for Wi-Fi Transmitters>

- (1) For handsets operating next to ear, hotspot mode or mini-tablet configurations, 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 the reported SAR of initial test position is ≤ 0.4 W/kg, SAR testing for remaining test positions is not 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.
- (2) For WLAN 2.4 GHz, the highest measured maximum output power channel for DSSS was selected for SAR measurement. When the reported SAR is ≤ 0.8 W/kg, no further SAR testing is required. Otherwise, SAR is evaluated at the next highest measured output power channel. When any reported SAR is > 1.2 W/kg, SAR is required for the third channel. For OFDM modes (802.11g/n), SAR is not required when the highest reported SAR for DSSS is adjusted by the ratio of OFDM to DSSS specified maximum output power and it is ≤ 1.2 W/kg.
- (3) For WLAN 5 GHz, the initial test configuration was selected according to the transmission mode with the highest maximum output power. When the reported SAR of initial test configuration is > 0.8 W/kg, SAR is required for the subsequent highest measured output power channel until the reported SAR result is ≤ 1.2 W/kg or all required channels are measured. For other transmission modes, SAR is not required when the highest reported SAR for initial test configuration is adjusted by the ratio of subsequent test configuration to initial test configuration specified maximum output power and it is ≤ 1.2 W/kg.
- (4) For WLAN MIMO mode, the power-based standalone SAR test exclusion or the sum of SAR provision in KDB 447498 to determine simultaneous transmission SAR test exclusion should be applied. Otherwise, SAR for MIMO mode will be measured with all applicable antennas transmitting simultaneously at the specified maximum output power of MIMO operation.

4.6.2 SAR Results for Body Exposure Condition (Separation Distance is 0 cm Gap)

Plot No.	Band	Mode	Test Position	Ch.	Duty Cycle	Max. Tune-up Power (dBm)	Measured Conducted Power (dBm)	Power Drift (dB)	Measured SAR-1g (W/kg)	Duty Cycle Factor	Tune-up Scaling Factor	Scaled SAR-1g (W/kg)
	WLAN2.4G	802.11b	Front Face	11	100	19.5	18.787	-0.02	0.040	1.000	1.178	0.05
	WLAN2.4G	802.11b	Rear Face	11	100	19.5	18.787	0.07	0.033	1.000	1.178	0.04
	WLAN2.4G	802.11b	Left Side	11	100	19.5	18.787	0.07	0.022	1.000	1.178	0.03
	WLAN2.4G	802.11b	Right Side	11	100	19.5	18.787	0.07	0.010	1.000	1.178	0.01
P01	WLAN2.4G	802.11b	Top Side	11	100	19.5	18.787	0.02	0.574	1.000	1.178	0.68
	WLAN2.4G	802.11b	Bottom Side	11	100	19.5	18.787	0.08	0.006	1.000	1.178	0.01

4.6.3 SAR Measurement Variability

According to KDB 865664 D01, SAR measurement variability was assessed for each frequency band, which is determined by the SAR probe calibration point and tissue-equivalent medium used for the device measurements. When both head and body tissue-equivalent media are required for SAR measurements in a frequency band, the variability measurement procedures should be applied to the tissue medium with the highest measured SAR, using the highest measured SAR configuration for that tissue-equivalent medium. Alternatively, if the highest measured SAR for both head and body tissue-equivalent media are ≤ 1.45 W/kg and the ratio of these highest SAR values, i.e., largest divided by smallest value, is ≤ 1.10 , the highest SAR configuration for either head or body tissue-equivalent medium may be used to perform the repeated measurement. 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.

Since all the measured SAR are less than 0.8 W/kg, the repeated measurement is not required.

Test Engineer : Dennis Ye

5. Calibration of Test Equipment

Equipment	Manufacturer	Model	SN	Cal. Date	Cal. Interval
System Validation Dipole	SPEAG	D2450V2	893	Sep. 18, 2021	3 Years
Data Acquisition Electronics	SPEAG	DAE4	1389	Nov. 09, 2023	1 Year
Dosimetric E-Field Probe	SPEAG	EX3DV4	3873	Aug. 22, 2023	1 Year
Dielectric Probe Kit	SPEAG	DAK-3.5	1076	Aug. 17, 2023	1 Year
ENA Series Network Analyzer	Agilent	E5071C	MY46214638	May. 10, 2023	1 Year
Spectrum Analyzer	KEYSIGHT	N9010A	MY54510355	May. 10, 2023	1 Year
MXG Analog Signal Generator	KEYSIGHT	N5183A	MY50143024	Feb. 14, 2023	1 Year
Power Meter	Agilent	N1914A	MY52180044	Feb. 15, 2023	1 Year
Power Sensor	Agilent	E9304A H18	MY52050011	Feb. 15, 2023	1 Year
Power Meter	ANRITSU	ML2495A	1506002	Feb. 14, 2023	1 Year
Power Sensor	ANRITSU	MA2411B	1339352	Feb. 14, 2023	1 Year
Temp. & Humi. Recorder	HUATO	A2000TH	HE20107684	May. 09, 2023	1 Year
Electronic Thermometer	YONGFA	YF-160A	120100323	May. 10, 2023	1 Year
Coupler	Woken	0110A056020-10	COM27RW1A3	May. 10, 2023	1 Year

Note:

- Referring to KDB 865664 D01 v01r04, the dipole calibration interval can be extended to 3 years with justification. The dipole are also not physically damaged, or repaired during the interval. The dipole justification can be found in appendix C.
The return loss is $< -20\text{dB}$, within 20% of prior calibration, the impedance is with 5ohm of prior calibration.

6. Measurement Uncertainty

DASY Uncertainty Budget According to IEEE 1528-2013 (0.3 - 6 GHz range)								
Error Description	Uncertainty Value (±%)	Probability	Divisor	(Ci) 1g	(Ci) 10g	Standard Uncertainty (1g) (±%)	Standard Uncertainty (10g) (±%)	(Vi) Veff
Measurement System								
Probe Calibration	6.95	N	1	1	1	6.95	6.95	∞
Axial Isotropy	4.70	R	1.732	0.7	0.7	1.90	1.90	∞
Hemispherical Isotropy	9.60	R	1.732	0.7	0.7	3.88	3.88	∞
Boundary Effects	2.00	R	1.732	1	1	1.15	1.15	∞
Linearity	4.70	R	1.732	1	1	2.71	2.71	∞
System Detection Limits	1.00	R	1.732	1	1	0.58	0.58	∞
Modulation Response	4.80	R	1.732	1	1	2.77	2.77	∞
Readout Electronics	0.30	N	1	1	1	0.30	0.30	∞
Response Time	0.00	R	1.732	1	1	0.00	0.00	∞
Integration Time	2.60	R	1.732	1	1	1.50	1.50	∞
RF Ambient Noise	3.00	R	1.732	1	1	1.73	1.73	∞
RF Ambient Reflections	3.00	R	1.732	1	1	1.73	1.73	∞
Probe Positioner	0.40	R	1.732	1	1	0.23	0.23	∞
Probe Positioning	6.70	R	1.732	1	1	3.87	3.87	∞
Max. SAR Eval.	4.00	R	1.732	1	1	2.31	2.31	∞
Test Sample Related								
Device Positioning	2.49	N	1	1	1	2.49	2.49	35
Device Holder	2.17	N	1	1	1	2.17	2.17	12
Power Drift	5.00	R	1.732	1	1	2.89	2.89	∞
Power Scaling	0.00	R	1.732	1	1	0.00	0.00	∞
Phantom and Setup								
Phantom Uncertainty	6.60	R	1.732	1	1	3.81	3.81	∞
SAR correction	1.20	R	1.732	1	0.84	0.69	0.58	∞
Liquid Conductivity (target)	10.00	R	1.732	0.78	0.71	4.50	4.10	∞
Liquid Conductivity (mea.)	2.50	R	1.732	0.78	0.71	1.13	1.02	∞
Temp. unc. - Conductivity	3.21	R	1.732	0.78	0.71	1.45	1.32	∞
Liquid Permittivity (target)	10.00	R	1.732	0.23	0.26	1.33	1.50	∞
Liquid Permittivity (mea.)	2.50	R	1.732	0.23	0.26	0.33	0.38	∞
Temp. unc. - Permittivity	0.72	R	1.732	0.23	0.26	0.10	0.11	∞
Combined Std. Uncertainty						13.1%	13.0%	5518
Coverage Factor for 95 %						K=2	K=2	
Expanded STD Uncertainty						26.2%	26.0%	

7. Information on the Testing Laboratories

We, Boomwave Test (Shenzhen) Co., Ltd., were founded in 2025 to provide our best service in EMC, Radio, Telecom and Safety consultation. Our laboratories are accredited and approved according to ISO/IEC 17025.

If you have any comments, please feel free to contact us at the following:

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Appendix A. SAR Plots of System Verification

The plots for system verification with largest deviation for each SAR system combination are shown as follows.

Appendix B. SAR Plots of SAR Measurement

The SAR plots for highest measured SAR in each exposure configuration, wireless mode and frequency band combination, and measured SAR > 1.5 W/kg are shown as follows.

Appendix C. Calibration Certificate for Probe and Dipole

The SPEAG calibration certificates are shown as follows.

Appendix D. Photographs of EUT and Setup