

FCC SAR TEST REPORT

FCC ID : 2AX2URW220GL
Equipment : Cat.1bis Module
Brand Name : Rolling Wireless
Model Name : RW220-GL
Applicant : Rolling Wireless S.a r.l.
8-10, rue Mathias Hardt 1717, Luxembourg
Standard : FCC 47 CFR Part 2 (2.1093)

The product was installed into Notebook Computer (Brand Name: HP, Model Name: HSN-I67C-4) during test.

The product was received on Oct. 30, 2025 and testing was started from Oct. 30, 2025 and completed on Oct. 30, 2025. We, SPORTON INTERNATIONAL INC., would like to declare that the tested sample provide by manufacturer and the test data has been evaluated in accordance with the test procedures given in 47 CFR Part 2.1093 and FCC KDB and has been pass the FCC requirement.

The test results in this report apply exclusively to the tested model / sample. Without written approval of SPORTON INTERNATIONAL INC. Laboratory, the test report shall not be reproduced except in full.



Approved by: Cona Huang / Deputy Manager



Sporton International Inc. Wensan Laboratory

No.58, Aly. 75, Ln. 564, Wenhua 3rd, Rd., Guishan Dist., Taoyuan City 333010, Taiwan



Table of Contents

1. Statement of Compliance	4
2. Guidance Applied.....	4
3. Equipment Under Test (EUT) Information	5
3.1 General Information	5
3.2 General LTE SAR Test and Reporting Considerations	7
4. RF Exposure Limits.....	8
4.1 Uncontrolled Environment.....	8
4.2 Controlled Environment.....	8
5. Specific Absorption Rate (SAR).....	9
5.1 Introduction	9
5.2 SAR Definition.....	9
6. System Description and Setup	10
6.1 Test Site Location.....	10
6.2 E-Field Probe	11
6.3 Data Acquisition Electronics (DAE)	11
6.4 Phantom.....	12
6.5 Device Holder.....	13
7. Measurement Procedures	14
7.1 Spatial Peak SAR Evaluation.....	14
7.2 Power Reference Measurement.....	15
7.3 Area Scan	15
7.4 Zoom Scan.....	16
7.5 Volume Scan Procedures.....	16
7.6 Power Drift Monitoring.....	16
8. Test Equipment List.....	17
9. System Verification	18
9.1 Tissue Verification	18
9.2 System Performance Check Results.....	18
10. Antenna Location	19
11. SAR Test Results	20
11.1 Body SAR.....	20
12. Uncertainty Assessment	21
13. References.....	21
Appendix A. Plots of System Performance Check	
Appendix B. Plots of High SAR Measurement	
Appendix C. DASY Calibration Certificate	
Appendix D. Test Setup Photos	



History of this test report

Report No.	Version	Description	Issued Date
FA5O2726-03	01	Initial issue of report	Nov. 27, 2025

1. Statement of Compliance

The maximum results of Specific Absorption Rate (SAR) for Rolling Wireless S.a r.l., Cat.1bis Module, RW220-GL, are as follows.

Frequency Band		Highest SAR Summary
		Body (Separation 0mm)
		1g SAR (W/kg)
LTE	LTE Band 12	0.34
	LTE Band 5/26	0.32
Date of Testing:		2025/10/30

Sporton Lab is accredited to ISO 17025 by Taiwan Accreditation Foundation and the FCC designation No. TW3786 under the FCC 2.948(e) by Mutual Recognition Agreement (MRA) in FCC test. This device is in compliance with Specific Absorption Rate (SAR) for general population/uncontrolled exposure limits (1.6 W/kg for Partial-Body 1g SAR) specified in FCC 47 CFR part 2 (2.1093) and ANSI/IEEE C95.1-1992, and had been tested in accordance with the measurement methods and procedures specified in IEEE 1528-2013 and FCC KDB publications.

Reviewed by: Jason Wang

Report Producer: Carlie Tsai

2. Guidance Applied

The Specific Absorption Rate (SAR) testing specification, method, and procedure for this device is in accordance with the following standards, the below KDB standard may not including in the TAF code without accreditation.

- FCC 47 CFR Part 2 (2.1093)
- ANSI/IEEE C95.1-1992
- IEEE 1528-2013
- FCC KDB 865664 D01 SAR Measurement 100 MHz to 6 GHz v01r04
- FCC KDB 865664 D02 SAR Reporting v01r02
- FCC KDB 447498 D01 General RF Exposure Guidance v06
- FCC KDB 616217 D04 SAR for laptop and tablets v01r02
- FCC KDB 941225 D05 SAR for LTE Devices v02r05

3. Equipment Under Test (EUT) Information

3.1 General Information

Product Feature & Specification	
Equipment Name	Cat.1bis Module
Brand Name	Rolling Wireless
Model Name	RW220-GL
FCC ID	2AX2URW220GL
Wireless Technology and Frequency Range	LTE Band 5: 824 MHz ~ 849 MHz LTE Band 12: 699 MHz ~ 716 MHz LTE Band 26: 814 MHz ~ 849 MHz
Mode	LTE: QPSK, 16QAM
Remark:	
1.	As the RF design of this device is identical to that in Sporton Report No.: FA591801-03, with the only variation being the CPU platform, the spot-check measurements presented in Section 11 of this report substantiate and justify the validity that the RF characteristics of the two products remain the same.

Host Information	
Equipment Name	Notebook Computer
Brand Name	HP
Model Name	HSN-I67C-4
Integrated WLAN Module	Brand Name: MediaTek Model Name: MT7925B14L
Integrated NFC Module	Brand Name: WNC Model Name: XR4V-1
Wireless Technology and Frequency Range	WLAN 2.4 GHz Band: 2400 MHz ~ 2483.5 MHz WLAN 5.2 GHz Band: 5150 MHz ~ 5250 MHz WLAN 5.3 GHz Band: 5250 MHz ~ 5350 MHz WLAN 5.6 GHz Band: 5470 MHz ~ 5725 MHz WLAN 5.8 GHz Band: 5725 MHz ~ 5850 MHz WLAN 5.9 GHz Band: 5850 MHz ~ 5895 MHz WLAN 6GHz Band: 5925 MHz ~ 6425 MHz, 6425 MHz ~ 6525 MHz, 6525 MHz ~ 6875 MHz, 6875 MHz ~ 7125 MHz Bluetooth: 2400 MHz ~ 2483.5 MHz NFC: 13.56 MHz
Mode	WLAN: 802.11a/b/g/n/ac/ax/be HT20/HT40/VHT20/VHT40/VHT80/VHT160/HE20/HE40/HE80/HE160/EHT20/EHT40/EHT80/EHT160 Bluetooth BR/EDR/LE NFC: ASK
EUT Stage	Production Unit
Remark:	
1.	The WLAN MediaTek MT7925B14L module is integrated into this model. The antenna is located at the top of the panel, where the distance is greater than 20 cm from the human body (refer to Section 10). SAR testing is not required. Sim-Tx analysis also not necessary, due to WWAN and WLAN antennas are not in the same location.
2.	NFC with other transmitters which the maximum of overlapping transmission including network hand-offs is not greater than 30 seconds, therefore NFC with other transmitter for simultaneous transmission analysis and compliance is not required.



WLAN Antenna Information									
Vendor 1	Ant. Type	PIFA			Vendor 1	Ant. Type	PIFA		
	Model No.	(Main/Tx1) 6036B0384001 (260-27593)				Model No.	(Aux/Tx2) 6036B0384201 (260-27592)		
	Peak Gain (dBi)					Peak Gain (dBi)			
	2400~2483.5MHz	1.17	5725~5850MHz	1.28		2400~2483.5MHz	-0.47	5725~5850MHz	0.93
	5150~5250MHz	1.53	5850~5895MHz	1.28		5150~5250MHz	1.05	5850~5895MHz	0.93
	5250~5350MHz	0.53	5925~7125MHz	2.11		5250~5350MHz	1.05	5925~7125MHz	1.94
	5470~5725MHz	1.28				5470~5725MHz	0.93		
Vendor 2	Ant. Type	PIFA			Vendor 2	Ant. Type	PIFA		
	Model No.	(Main/Tx1) 6036B0385201 (81EACC15.G27)				Model No.	(Aux/Tx2) 6036B0385101 (81EACC15.G28)		
	Peak Gain (dBi)					Peak Gain (dBi)			
	2400~2483.5MHz	1.94	5725~5850MHz	0.57		2400~2483.5MHz	1.63	5725~5850MHz	-0.26
	5150~5250MHz	1.17	5850~5895MHz	0.57		5150~5250MHz	-0.65	5850~5895MHz	-0.26
	5250~5350MHz	1.58	5925~7125MHz	2.28		5250~5350MHz	-0.16	5925~7125MHz	-0.93
	5470~5725MHz	0.88				5470~5725MHz	-0.5		

3.2 General LTE SAR Test and Reporting Considerations

Summarized necessary items addressed in KDB 941225 D05 v02r05										
FCC ID			2AX2URW220GL							
Equipment Name			Cat.1bis Module							
Operating Frequency Range of each LTE transmission band			LTE Band 5: 824 MHz ~ 849 MHz LTE Band 12: 699 MHz ~ 716 MHz LTE Band 26: 814 MHz ~ 849 MHz							
Channel Bandwidth			LTE Band 5:1.4MHz, 3MHz, 5MHz, 10MHz LTE Band 12:1.4MHz, 3MHz, 5MHz, 10MHz LTE Band 26:1.4MHz, 3MHz, 5MHz, 10MHz, 15MHz							
uplink modulations used			QPSK / 16QAM							
LTE Voice / Data requirements			Data only							
LTE MPR permanently built-in by design			Table 6.2.3-1: Maximum Power Reduction (MPR) for Power Class 1, 2 and 3							
			Modulation	Channel bandwidth / Transmission bandwidth (N _{RB})						MPR (dB)
				1.4 MHz	3.0 MHz	5 MHz	10 MHz	15 MHz	20 MHz	
			QPSK	> 5	> 4	> 8	> 12	> 16	> 18	≤ 1
			16 QAM	≤ 5	≤ 4	≤ 8	≤ 12	≤ 16	≤ 18	≤ 1
			16 QAM	> 5	> 4	> 8	> 12	> 16	> 18	≤ 2
			64 QAM	≤ 5	≤ 4	≤ 8	≤ 12	≤ 16	≤ 18	≤ 2
			64 QAM	> 5	> 4	> 8	> 12	> 16	> 18	≤ 3
			256 QAM	≥ 1						≤ 5
LTE A-MPR			In the base station simulator configuration, Network Setting value is set to NS_01 to disable A-MPR during SAR testing and the LTE SAR tests was transmitting on all TTI frames (Maximum TTI)							
Spectrum plots for RB configuration			A properly configured base station simulator was used for the SAR and power measurement; therefore, spectrum plots for each RB allocation and offset configuration are not included in the SAR report.							
Transmission (H, M, L) channel numbers and frequencies in each LTE band										
LTE Band 5										
	Bandwidth 1.4 MHz		Bandwidth 3 MHz		Bandwidth 5 MHz		Bandwidth 10 MHz			
	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)		
L	20407	824.7	20415	825.5	20425	826.5	20450	829		
M	20525	836.5	20525	836.5	20525	836.5	20525	836.5		
H	20643	848.3	20635	847.5	20625	846.5	20600	844		
LTE Band 12										
	Bandwidth 1.4 MHz		Bandwidth 3 MHz		Bandwidth 5 MHz		Bandwidth 10 MHz			
	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)		
L	23017	699.7	23025	700.5	23035	701.5	23060	704		
M	23095	707.5	23095	707.5	23095	707.5	23095	707.5		
H	23173	715.3	23165	714.5	23155	713.5	23130	711		
LTE Band 26										
	Bandwidth 1.4 MHz		Bandwidth 3 MHz		Bandwidth 5 MHz		Bandwidth 10 MHz		Bandwidth 15 MHz	
	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)
L	26697	814.7	26705	815.5	26715	816.5	26740	819	26765	821.5
M	26865	831.5	26865	831.5	26865	831.5	26865	831.5	26865	831.5
H	27033	848.3	27025	847.5	27015	846.5	26990	844	26965	841.5

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 Occupational/Controlled Exposure (W/kg)

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

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

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

1. 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. Specific Absorption Rate (SAR)

5.1 Introduction

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

5.2 SAR Definition

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

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

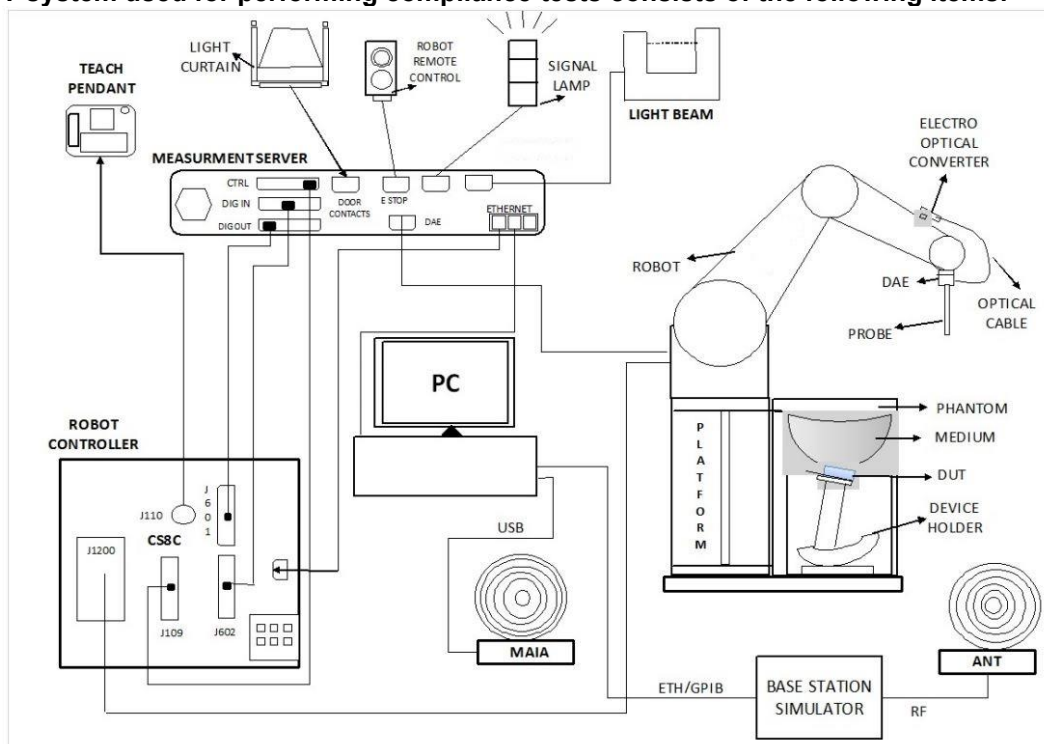
SAR is expressed in units of Watts per kilogram (W/kg)

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

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

6. System Description and Setup

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



- The DASY system in SAR Configuration is shown above
- A standard high precision 6-axis robot with controller, teach pendant and software. An arm extension for accommodating the data acquisition electronics (DAE).
- An isotropic Field probe optimized and calibrated for the targeted measurement.
- A data acquisition electronics (DAE) which performs the signal amplification, signal multiplexing, AD-conversion, offset measurements, mechanical surface detection, collision detection, etc. The unit is battery powered with standard or rechargeable batteries. The signal is optically transmitted to the EOC.
- The Electro-optical converter (EOC) performs the conversion from optical to electrical signals for the digital communication to the DAE. To use optical surface detection, a special version of the EOC is required. The EOC signal is transmitted to the measurement server.
- The function of the measurement server is to perform the time critical tasks such as signal filtering, control of the robot operation and fast movement interrupts.
- The Light Beam used is for probe alignment. This improves the (absolute) accuracy of the probe positioning.
- A computer running windows software and the DASY software.
- Remote control and teach pendant as well as additional circuitry for robot safety such as warning lamps, etc.
- The phantom, the device holder and other accessories according to the targeted measurement.

6.1 Test Site Location

The SAR measurement facilities used to collect data are within both Sporton Lab list below test site location are accredited to ISO 17025 by Taiwan Accreditation Foundation (TAF code: 1190 and 3786) and the FCC designation No. TW1190 and TW3786 under the FCC 2.948(e) by Mutual Recognition Agreement (MRA) in FCC test.

Laboratory	EMC & Wireless Communications Laboratory		Wensan Laboratory				
Test Site Location	TW1190 No.52, Huaya 1st Rd., Guishan Dist., Taoyuan City 333, Taiwan		TW3786 No.58, Aly. 75, Ln. 564, Wenhua 3rd, Rd., Guishan Dist., Taoyuan City 333010, Taiwan				
Test Site No.	SAR01-HY	SAR03-HY	SAR08-HY	SAR09-HY	SAR15-HY	SAR18-HY	SAR21-HY
	SAR04-HY	SAR05-HY	SAR11-HY	SAR12-HY	SAR16-HY	SAR19-HY	SAR22-HY
	SAR06-HY	SAR10-HY	SAR13-HY	SAR14-HY	SAR17-HY	SAR20-HY	

6.2 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.

<ES3DV3 Probe>

Construction	Symmetric design with triangular core Interleaved sensors Built-in shielding against static charges PEEK enclosure material (resistant to organic solvents, e.g., DGBE)	
Frequency	4 MHz – 4 GHz; Linearity: ± 0.2 dB (30 MHz – 4 GHz)	
Directivity	± 0.2 dB in TSL (rotation around probe axis) ± 0.3 dB in TSL (rotation normal to probe axis)	
Dynamic Range	5 μ W/g – >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: 3.0 mm	

<EX3DV4 Probe>

Construction	Symmetric design with triangular core Built-in shielding against static charges PEEK enclosure material (resistant to organic solvents, e.g., DGBE)	
Frequency	4 MHz – >6 GHz Linearity: ± 0.2 dB (30 MHz – 6 GHz)	
Directivity	± 0.3 dB in TSL (rotation around probe axis) ± 0.5 dB in TSL (rotation normal to probe axis)	
Dynamic Range	10 μ W/g – >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	

6.3 Data Acquisition Electronics (DAE)

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

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



Fig 5.1 Photo of DAE

6.4 Phantom

<SAM Twin Phantom>

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

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

<ELI Phantom>

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

The ELI phantom is intended for compliance testing of handheld and body-mounted wireless devices in the frequency range of 30 MHz to 6 GHz. ELI4 is fully compatible with standard and all known tissue simulating liquids.

6.5 Device Holder

<Mounting Device for Hand-Held Transmitter>

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



Mounting Device for Hand-Held Transmitters



Mounting Device Adaptor for Wide-Phones

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

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



Mounting Device for Laptops

7. Measurement Procedures

The measurement procedures are as follows:

- (a) Configure the device RF transmitters to be in continuous transmission mode., 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

7.1 Spatial Peak SAR Evaluation

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

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

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

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

7.2 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.

7.3 Area Scan

The area scan is used as a fast scan in two dimensions to find the area of high field values, before doing a fine measurement around the hot spot. The sophisticated interpolation routines implemented in DASY software can find the maximum found in the scanned area, within a range of the global maximum. The range (in dB0) is specified in the standards for compliance testing. For example, a 2 dB range is required in IEEE standard 1528 and IEC 62209 standards, whereby 3 dB is a requirement when compliance is assessed in accordance with the ARIB standard (Japan), if only one zoom scan follows the area scan, then only the absolute maximum will be taken as reference. For cases where multiple maximums are detected, the number of zoom scans has to be increased accordingly.

Area scan parameters extracted from FCC KDB 865664 D01v01r04 SAR measurement 100 MHz to 6 GHz.

	≤ 3 GHz	> 3 GHz
Maximum distance from closest measurement point (geometric center of probe sensors) to phantom surface	5 ± 1 mm	$\frac{1}{2} \cdot \delta \cdot \ln(2) \pm 0.5$ mm
Maximum probe angle from probe axis to phantom surface normal at the measurement location	$30^\circ \pm 1^\circ$	$20^\circ \pm 1^\circ$
Maximum area scan spatial resolution: Δx_{Area} , Δy_{Area}	≤ 2 GHz: ≤ 15 mm $2 - 3$ GHz: ≤ 12 mm	$3 - 4$ GHz: ≤ 12 mm $4 - 6$ GHz: ≤ 10 mm
	When the x or y dimension of the test device, in the measurement plane orientation, is smaller than the above, the measurement resolution must be $\leq$ the corresponding x or y dimension of the test device with at least one measurement point on the test device.	

7.4 Zoom Scan

Zoom scans are used to assess the peak spatial SAR values within a cubic averaging volume containing 1 gram and 10 gram of simulated tissue. The zoom scan measures points (refer to table below) within a cube whose base faces are centered on the maxima found in a preceding area scan job within the same procedure. When the measurement is done, the zoom scan evaluates the averaged SAR for 1 gram and 10 gram and displays these values next to the job's label.

Zoom scan parameters extracted from FCC KDB 865664 D01v01r04 SAR measurement 100 MHz to 6 GHz.

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

7.5 Volume Scan Procedures

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

7.6 Power Drift Monitoring

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

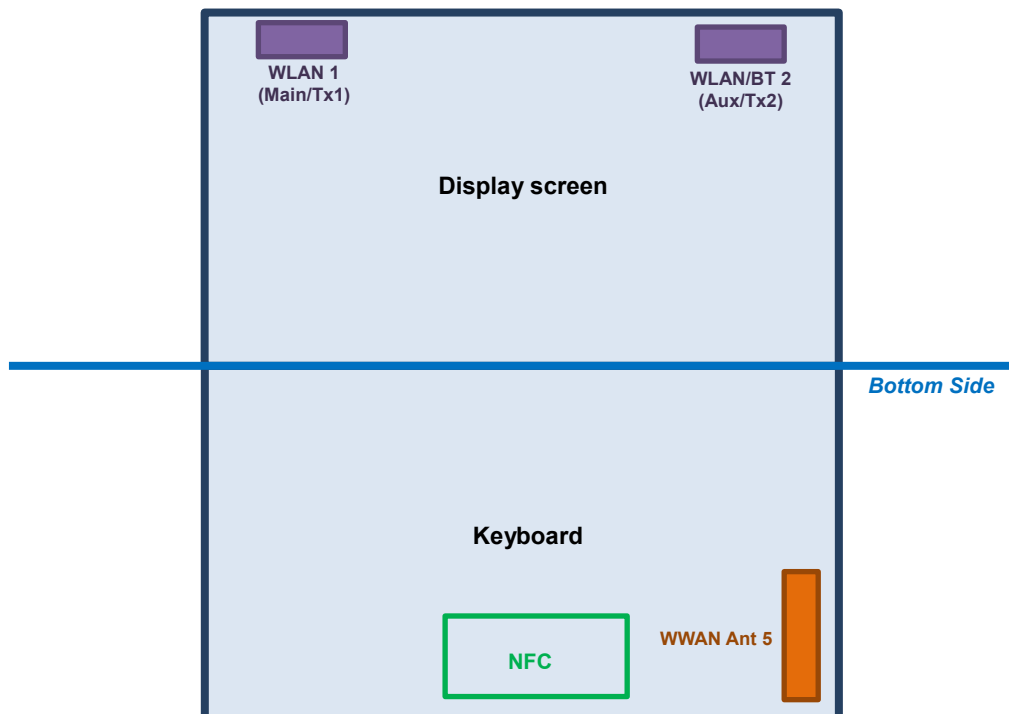
8. Test Equipment List

Manufacturer	Name of Equipment	Type/Model	Serial Number	Last Cal.	Due Date
SPEAG	750MHz System Validation Kit	D750V3	1117	Mar. 12, 2025	Mar. 11, 2026
SPEAG	Data Acquisition Electronics	DAE4	1805	May. 21, 2025	May. 20, 2026
SPEAG	Dosimetric E-Field Probe	EX3DV4	7793	Feb. 18, 2025	Feb. 17, 2026
SPEAG	Dielectric Probe Kit	DAK-3.5	1270	May. 19, 2025	May. 18, 2026
Testo	Hygro meter	608-H1	45256904	Dec. 06, 2024	Dec. 05, 2025
Anritsu	Radio Communication Analyzer	MT8821C	6201341950	Nov. 12, 2024	Nov. 11, 2025
SPEAG	Device Holder	N/A	N/A	N/A	N/A
Anritsu	Signal Generator	MG3710A	6201502524	Sep. 24, 2025	Sep. 23, 2026
Keysight	ENA Network Analyzer	E5071C	MY46104758	Oct. 14, 2025	Oct. 13, 2026
LINE SEIKI	Digital Thermometer	DTM3000-spezial	3902	Feb. 19, 2025	Feb. 18, 2026
Anritsu	Power Meter	ML2496A	2119003	Jul. 14, 2025	Jul. 13, 2026
R&S	Power Sensor	NRP8S	109687	Sep. 22, 2025	Sep. 21, 2026
Anritsu	Spectrum Analyzer	N9010A	MY53470118	Sep. 09, 2025	Sep. 08, 2026
Mini-Circuits	Power Amplifier	ZVE-8G+	D120604	Oct. 17, 2025	Oct. 16, 2026
ATM	Dual Directional Coupler	C122H-10	P610410z-02	Note 1	
Warison	Directional Coupler	WCOU-10-50S-10	WR889BMC4B1	Note 1	
Woken	Attenuator 1	WK0602-XX	N/A	Note 1	
PE	Attenuator 2	PE7005-10	N/A	Note 1	
PE	Attenuator 3	PE7005- 3	N/A	Note 1	

General Note:

1. Prior to system verification and validation, the path loss from the signal generator to the system check source and the power meter, which includes the amplifier, cable, attenuator and directional coupler, was measured by the network analyzer. The reading of the power meter was offset by the path loss difference between the path to the power meter and the path to the system check source to monitor the actual power level fed to the system check source.
2. The dipole calibration interval can be extended to 3 years with justification according to KDB 865664 D01. The dipoles are also not physically damaged, or repaired during the interval. The justification data in appendix C can be found which the return loss is < -20dB, within 20% of prior calibration, the impedance is within 5 ohm of prior calibration for each dipole.

10. Antenna Location



The separation distance for antenna to edge :

Antenna	To Bottom Side (mm)
WLAN 1(Main/Tx2)	215.686
WLAN/BT 2(Aux/Tx1)	215.686
WWAN Antenna 5	11.65



11. SAR Test Results

General Note:

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 WWAN: Reported SAR(W/kg)= Measured SAR(W/kg)*Tune-up Scaling Factor

11.1 Body SAR

【LTE SAR】

Plot No	Band	BW	Modulation	RB Size	RB Offset	Test Position	Gap (mm)	Antenna	Ch.	Freq. (MHz)	Average Power (dBm)	Tune-Up Limit (dBm)	Tune-Up Scaling Factor	Power Drift (dB)	Measured 1g SAR (W/kg)	Reported 1g SAR (W/kg)
01	LTE Band 12	10M	QPSK	25	0	Bottom Side	0mm	Ant 5	23095	707.5	16.08	17.00	1.236	0.00	0.233	0.288

Test Engineer : Albert Chen

12. Uncertainty Assessment

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

Declaration of Conformity:

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

Comments and Explanations:

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

13. References

- [1] FCC 47 CFR Part 2 "Frequency Allocations and Radio Treaty Matters; General Rules and Regulations"
- [2] ANSI/IEEE Std. C95.1-1992, "IEEE Standard for Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 kHz to 300 GHz", September 1992
- [3] IEEE Std. 1528-2013, "IEEE Recommended Practice for Determining the Peak Spatial-Average Specific Absorption Rate (SAR) in the Human Head from Wireless Communications Devices: Measurement Techniques", Sep 2013
- [4] SPEAG DASY System Handbook
- [5] FCC KDB 447498 D01 v06, "Mobile and Portable Device RF Exposure Procedures and Equipment Authorization Policies", Oct 2015
- [6] FCC KDB 941225 D05 v02r05, "SAR Evaluation Considerations for LTE Devices", Dec 2015
- [7] FCC KDB 616217 D04 v01r02, "SAR Evaluation Considerations for Laptop, Notebook, Netbook and Tablet Computers", Oct 2015
- [8] FCC KDB 865664 D01 v01r04, "SAR Measurement Requirements for 100 MHz to 6 GHz", Aug 2015.
- [9] FCC KDB 865664 D02 v01r02, "RF Exposure Compliance Reporting and Documentation Considerations" Oct 2015.