TEST REPORT

APPLICANT	:	Strutt Pte. Ltd.
PRODUCT NAME	:	Smart Everyday Vehicle
MODEL NAME	:	Strutt ev[1] , Strutt ev[1] c
BRAND NAME	:	STRUTT
FCC ID	:	2BUN8-SEV1
STANDARD(S)	:	FCC 47 CFR Part 2 (2.1093) IEEE 1528-2013
RECEIPT DATE	:	2025-12-31
TEST DATE	:	2026-03-02 to 2026-03-07
ISSUE DATE	:	2026-04-02

Edited by: Pang Siyu

Pang Siyu (Rapporteur)

Approved by: Shen Junsheng

Shen Junsheng (Supervisor)

NOTE: This document is issued by Shenzhen Morlab Communications Technology Co., the test report shall not be reproduced except in full without prior written permission of the company. The test results apply only to the particular sample(s) tested and to the specific tests carried out which is available on request for validation and information confirmed at our website.

MORLAB
Shenzhen Morlab Communications Technology Co., Ltd.
FL.1-3, Building A, FeiYang Science Park, No.8 LongChang Road,
Block67, BaoAn District, ShenZhen , GuangDong Province, P. R. China
Tel: 86-755-36698555 Fax: 86-755-36698525
Http://www.morlab.cn E-mail: service@morlab.cn

DIRECTORY

1. Statement of Compliance 5
2. Technical Information 6
2.1. Applicant and Manufacturer Information 6
2.2. Equipment under Test (EUT) Description 6
2.3. Environment of Test Site/Conditions 7
3. Specific Absorption Rate (SAR) 8
3.1. Introduction 8
3.2. SAR Definition 8
4. RF Exposure Limits 9
4.1. Uncontrolled Environment 9
4.2. Controlled Environment 9
5. Applied Reference Documents 10
6. SAR Measurement System 11
6.1. E-Field Probe 12
6.2. Data Acquisition Electronics (DAE) 13
6.3. Robot 13
6.4. Measurement Server 14
6.5. Light Beam Unit 14
6.6. Phantom 14
6.7. Device Holder 15
6.8. Data Storage and Evaluation 16
6.9. Test Equipment List 18
7. Tissue Simulating Liquids 20
8. SAR System Verification 22
8.1. Purpose of System Performance Check 22
8.2. System Setup 22

8.3. Validation Results 23
9. EUT Testing Position 26
9.1. Body-worn Configurations 26
10. Measurement Procedures 27
10.1. Spatial Peak SAR Evaluation 27
10.2. Power Reference Measurement 28
10.3. Area Scan Procedures 28
10.4. Zoom Scan Procedures 28
10.5. SAR Averaged Methods 29
10.6. Power Drift Monitoring 29
11. SAR Test Procedure 30
11.1. General Scan Requirements 30
11.2. Test Procedure 31
11.3. Description of Interpolation/Extrapolation Scheme 31
11.4. Wireless Router 31
12. SAR Test Configuration 33
13. Conducted Power List 39
14. Exposure Positions Consideration 40
15. Block Diagram of the Tests to be Performed 41
15.1. Body 41
16. Test Results List 42
16.1. Test Guidance 42
16.2. Body SAR Data 43
17. Simultaneous Transmission Evaluation 45
17.1. Simultaneous Transmission Consideration 45
17.2. Simultaneous Transmission Analysis 46
18. Uncertainty Assessment 47
Annex A General Information 48

Annex B Test Setup Photos 49

Annex C Plots of System Performance Check 49

Annex D Plots of Maximum SAR Test Results 49

Annex E Conducted Power 49

Annex F DASY Calibration Certificate 49

Notes 50

Changed History		
Version	**Date**	**Reason for Change**
1.0	2026-04-02	First edition

Note: The latest revision of the report supersedes all previous version.

1. Statement of Compliance

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

Frequency Band		Highest SAR Summary
		Body (Gap 0 mm)
		1g SAR (W/kg)
LTE	LTE Band 5	0.011
	LTE Band 7	0.045
	LTE Band 12	0.011
	LTE Band 13	0.020
	LTE Band 25/2	0.065
	LTE Band 41/38	0.052
	LTE Band 66/4	0.030
WLAN	2.4GHz WLAN	0.075
	5GHz WLAN	0.102
2.4GHz Band	Bluetooth (Estimated)	0.084

Highest Simultaneous Transmission SAR_{1g} (W/Kg):	0.251	Limit (W/kg): 1.6

Note:

1. This device is in compliance with Specific Absorption Rate (SAR) for general population or uncontrolled exposure limits (1.6 W/kg as averaged over any 1 gram of tissue; specified in FCC 47 CFR part 1 (1.1310) 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.
2. For LTE Band 2/4/38 is full covered by LTE Band 25/66/41, therefore only LTE Band 66/12 was tested.
3. The declarations of EUT presented in the report are provided by applicant and/or manufacturer, and the test laboratory is not responsible for the accuracy of the information.

2. Technical Information

Note: Provide by applicant.

2.1. Applicant and Manufacturer Information

Applicant:	Strutt Pte. Ltd.
Applicant Address:	1 BULIM LANE 2, #05-53 Bulim Square Singapore (648110)
Manufacturer:	Strutt Pte. Ltd.
Manufacturer Address:	1 BULIM LANE 2, #05-53 Bulim Square Singapore (648110)

2.2. Equipment under Test (EUT) Description

Product Name:	Smart Everyday Vehicle
EUT No.:	6#
Hardware Version:	v1.0.0.0
Software Version:	v1.0.0.0
Frequency Bands:	LTE Band 2: 1850 MHz ~ 1910 MHz LTE Band 4: 1710 MHz ~ 1755 MHz LTE Band 5: 824 MHz ~ 849 MHz LTE Band 7: 2500 MHz ~ 2570 MHz LTE Band 12: 699 MHz ~ 716 MHz LTE Band 13: 777 MHz ~ 787 MHz LTE Band 25: 1850 MHz ~ 1915 MHz LTE Band 38: 2570 MHz ~ 2620 MHz LTE Band 41: 2496 MHz ~ 2690 MHz LTE Band 66: 1710 MHz ~ 1780 MHz WLAN 2.4GHz: 2412 MHz ~ 2472 MHz WLAN 5.2GHz: 5180 MHz ~ 5240 MHz WLAN 5.3GHz: 5260 MHz ~ 5320 MHz WLAN 5.5GHz: 5500 MHz ~ 5700 MHz WLAN 5.8GHz: 5745 MHz ~ 5825 MHz Bluetooth: 2402 MHz ~ 2480 MHz
Modulation Mode:	LTE: QPSK, 16QAM 802.11b: DSSS 802.11a/g: OFDM 802.11n-HT20/40: OFDM 802.11ac-VHT20/40/80: OFDM Bluetooth LE: GFSK (1Mbps, 2Mbps)
Antenna Type:	WWAN: FPC Antenna

	WLAN: FPC Antenna Bluetooth: PCB Antenna	
SIM Cards Description:	eSIM	LTE

Note:

1. According to the certificate holder, there are differences between models Strutt ev¹ and Strutt ev¹c, as follows:
   a) Appearance
      Strutt ev¹: The front lower shell of the chassis is dark gray.
      Strutt ev¹c: The front lower shell of the chassis is light gray.
   b) Software
      Strutt ev¹: Supports: Manual, AI Voice Assistant, Co-Pilot, Co-Pilot+, Pathfinder, Waypoint, Follow, and Replay.
      Strutt ev¹c: Supports: Manual, AI Voice Assistant, Co-Pilot, Co-Pilot+, Pathfinder, and Waypoint.

   Apart from the differences mentioned above, the two models are identical in terms of hardware configurations, performance parameters, security designs, etc. The main measuring model is Strutt ev¹, only the results for Strutt ev¹ were recorded in this report.
2. For more detailed description, please refer to specification or user manual supplied by the applicant and/or manufacturer.

2.3. Environment of Test Site/Conditions

Normal Temperature (NT):	18-25 °C
Relative Humidity:	30-75 %

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

The EUT shall use its internal transmitter. The antenna(s), battery and accessories shall be those specified by the Factory. The EUT battery must be fully charged and checked periodically during the test to ascertain uniform power output. If a wireless link is used, the antenna connected to the output of the base station simulator shall be placed at least 50 cm away from the handset.
The signal transmitted by the simulator to the antenna feeding point shall be lower than the output power level of the handset by at least 35 dB.

3. Specific Absorption Rate (SAR)

3.1. Introduction

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

3.2. SAR Definition

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

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

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

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

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

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

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

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

4. RF Exposure Limits

4.1. Uncontrolled Environment

Uncontrolled Environments are defined as locations where there is the exposure of individuals who have no knowledge or control of their exposure. The general population/uncontrolled exposure limits are applicable to situations in which the general public may be exposed or in which persons who are exposed as a consequence of their employment may not be made fully aware of the potential for exposure or cannot exercise control over their exposure. Members of the general public would come under this category when exposure is not employment-related; for example, in the case of a wireless transmitter that exposes persons in its vicinity.

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

Type Exposure	Uncontrolled Environment Limit
Spatial Peak SAR (1g cube tissue for head and trunk)	1.6 W/kg
Spatial Peak SAR (10g cube tissue for limbs)	4.0 W/kg
Spatial Peak SAR (1g cube tissue for whole body)	0.08 W/kg

Note:

1. Occupational/Uncontrolled Environments are defined as locations where there is exposure that may be incurred by people who are aware of the potential for exposure (i.e. as a result of employment or occupation).
2. Whole-Body SAR is averaged over the entire body, partial-body SAR is averaged over any 1gram of tissue defined as a tissue volume in the shape of a cube. SAR for hands, wrists, feet and ankles is averaged over any 10 grams of tissue defined as a tissue volume in the shape of a cube.

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.

5. Applied Reference Documents

Leading reference documents for testing:

Identity	Document Title	Remark
FCC 47 CFR Part 2 (2.1093)	Radio Frequency Radiation Exposure Evaluation: Portable Devices	/
IEEE 1528-2013	IEEE Recommended Practice for Determining the Peak Spatial-Average Specific Absorption Rate (SAR) in the Human Head from Wireless Communications Devices: Measurement Techniques	/
KDB 447498 D01v06	General RF Exposure Guidance	/
KDB 248227 D01v02r02	SAR Measurement Procedures for 802.11 Transmitters	/
KDB 865664 D01v01r04	SAR Measurement 100 MHz to 6 GHz	/
KDB 865664 D02v01r02	RF Exposure Reporting	/
KDB 648474 D04v01r03	Handset SAR	/
KDB 941225 D05v02r05	SAR Evaluation Consideration for LTE Devices	/
KDB 941225 D06v02r01	SAR Evaluation Procedures For Portable Devices With Wireless Router Capabilities	/
Note: Any additions, deviation, or exclusions from the method shall be noted in the “Remark”.		

6. SAR Measurement System

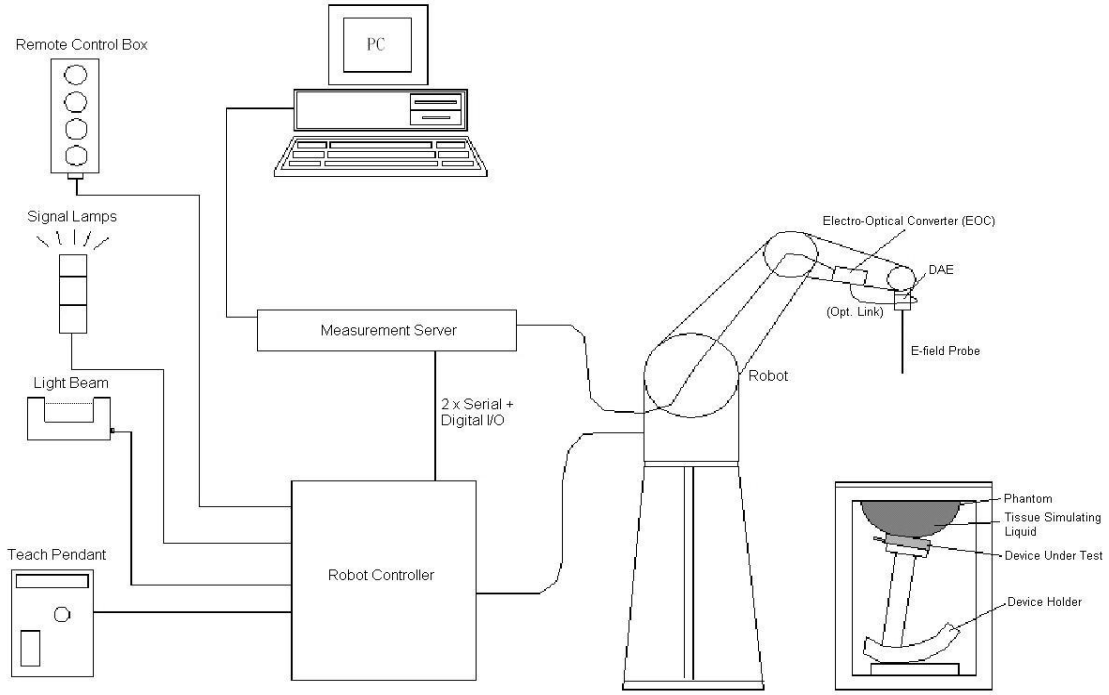


Fig 6.1 SPEAG DASY System Configurations

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

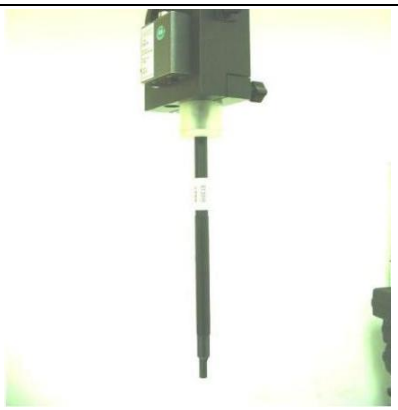
- A standard high precision 6-axis robot with controller, a teach pendant and software.
- A data acquisition electronic (DAE) attached to the robot arm extension.
- A dosimetric probe equipped with an optical surface detector system.
- The electro-optical converter (ECO) performs the conversion between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

6.1. E-Field Probe

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

➢ **E-Field Probe Specification**

<ES3DV3 Probe>

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

<EX3DV4 Probe>

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

➢ **E-Field Probe Calibration**

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

6.2. Data Acquisition Electronics (DAE)

The data acquisition electronics (DAE) consists of a highly sensitive electrometer-grade preamplifier with auto-zeroing, a channel and gain-switching multiplexer, a fast16 bit AD-converter and a command decoder and control logic unit. AD-converter and a command decoder and control logic unit. Transmission to the measurement server is accomplished through an optical downlink for data and status information as well as an optical uplink for commands and the clock. The input impedance of the DAE is 200MOhm; the inputs are symmetrical and floating. Common mode rejection is above 80 dB.

Fig 6.4 Photo of DAE

6.3. Robot

The SPEAG DASY system uses the high precision robots (DASY4: RX90BL; DASY5: TX90XL) type from Stäubli SA (France). For the 6-axis controller system, the robot controller version (DASY4: CS7MB; DASY5: CS8c) from Stäubli is used. The Stäubli robot series have many features that are important for our application:

High precision (repeatability ±0.035 mm)

High reliability (industrial design)

Jerk-free straight movements

Low ELF interference (the closed metallic construction shields against motor control fields)

Fig 6.5 Photo of DASY5

6.4. Measurement Server

The measurement server is based on a PC/104 CPU board with CPU (DASY4: 166 MHz, Intel Pentium; DASY5: 400 MHz, Intel Celeron), chip disk (DASY4: 32 MB; DASY5: 128 MB), RAM (DASY4: 64 MB, DASY5: 128 MB). The necessary circuits for communication with the DAE electronic box, as well as the 16 bits AD converter system for optical detection and digital I/O interface are contained on the DASY I/O board, which is directly connected to the PC/104 bus of the CPU board. The measurement server performs all the real-time data evaluation for field measurements and surface detection, controls robot movements and handles safety operations.

Fig 6.6 Photo of Server for DASY5

6.5. Light Beam Unit

The light beam switch allows automatic "tooling" of the probe. During the process, the actual position of the probe tip with respect to the robot arm is measured, as well as the probe length and the horizontal probe offset. The software then corrects all movements, such that the robot coordinates are valid for the probe tip.

The repeatability of this process is better than 0.1 mm. If a position has been taught with an aligned probe, the same position will be reached with another aligned probe within 0.1 mm, even if the other probe has different dimensions. During probe rotations, the probe tip will keep its actual position.

Fig. 6.7 Photo of Light Beam

6.6. Phantom

<SAM Twin Phantom>

Shell Thickness	2 ± 0.2 mm (sagging: <1%) Center ear point: 6 ± 0.2 mm	
Filling Volume	Approx. 25 liters	
Dimensions	Length: 1000 mm; Width: 500 mm; Height: adjustable feet	
Measurement Areas	Left Head, Right Head, Flat Phantom	**Fig. 6.8 Photo of SAM Phantom**

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

6.7. Device Holder

<Device Holder for SAM Twin Phantom>

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

The DASY device holder is designed to cope with different positions given in the standard. It has two scales for the device rotation (with respect to the body axis) and the device inclination (with respect to the line between the ear reference points). The rotation center for both scales is the ear reference point (EPR). Thus the device needs no repositioning when changing the angles.

The DASY device holder is constructed of low-loss POM material having the following dielectric parameters: relative permittivity ε = 3 and loss tangent δ = 0.02. The amount of dielectric material has been reduced in the closest vicinity of the device, since measurements have suggested that the influence of the clamp on the test results could thus be lowered.

<Laptop Extension Kit>

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

Fig 6.9 Device Holder

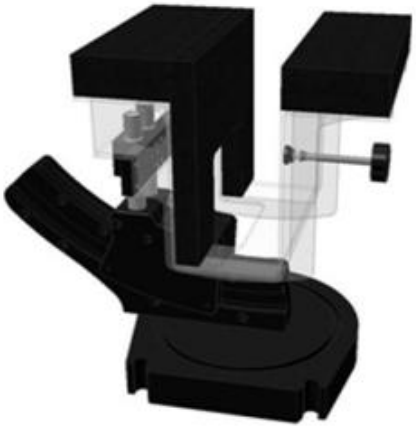


Fig 6.10 Laptop Extension Kit

6.8. Data Storage and Evaluation

➢ **Data Storage**

The DASY software stores the assessed data from the data acquisition electronics as raw data (in microvolt readings from the probe sensors), together with all the necessary software parameters for the data evaluation (probe calibration data, liquid parameters and device frequency and modulation data) in measurement files. The post-processing software evaluates the desired unit and format for output each time the data is visualized or exported. This allows verification of the complete software setup even after the measurement and allows correction of erroneous parameter settings. For example, if a measurement has been performed with an incorrect crest factor parameter in the device setup, the parameter can be corrected afterwards and the data can be reevaluated.
The measured data can be visualized or exported in different units or formats, depending on the selected probe type (e.g., [V/m], [A/m], [Mw/g]). Some of these units are not available in certain situations or give meaningless results, e.g., a SAR-output in a non-lose media, will always be zero. Raw data can also be exported to perform the evaluation with other software packages.

➢ **Data Evaluation**

The DASY post-processing software (SEMCAD) automatically executes the following procedures to calculate the field units from the microvolt readings at the probe connector. The parameters used in the evaluation are stored in the configuration modules of the software.

Probe parameters:	- Sensitivity	$Norm_i$, a_{i0}, a_{i1}, a_{i2}
	- Conversion factor	$ConvF_i$
	- Diode compression point	dcpi
Device parameters:	- Frequency	f
	- Crest factor	cf
Media parameters:	- Conductivity	σ
	- Density	ρ

These parameters must be set correctly in the software. They can be found in the component documents or they can be imported into the software from the configuration files issued for the DASY components. In the direct measuring mode of the multi-meter option, the parameters of the actual system setup are used. In the scan visualization and export modes, the parameters stored in the corresponding document files are used.

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

exciting field is pulsed, the crest factor of the signal must be known to correctly compensate for peak power.

The formula for each channel can be given as:

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

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

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

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

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

With V_i = compensated signal of channel I, (I = x, y, z)
$Norm_i$ = sensor sensitivity of channel I, (I = x, y, z), Mv/(V/m)^2 forE-field Probes ConvF = sensitivity enhancement in solution
a_{ij} = sensor sensitivity factors for H-field probes
f = carrier frequency [GHz]
E_i = electric field strength of channel I in V/m
H_i = magnetic field strength of channel I in A/m

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

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

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

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

with SAR = local specific absorption rate in mW/g
E_{tot} = total field strength in V/m
σ = conductivity in [mho/m] or [Siemens/m]
ρ = equivalent tissue density in g/cm^3

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

6.9. Test Equipment List

Manufacturer	Name of Equipment	Type/Model	Serial No./ SW Version	Calibration	
				Last Cal.	Due Date
SPEAG	750MHz System Validation Kit	D750V3	1223	2025.06.25	2028.06.24
SPEAG	900MHz System Validation Kit	D900V2	1d064	2024.10.21	2027.10.20
SPEAG	1800MHz System Validation Kit	D1800V2	2d158	2024.10.21	2027.10.20
SPEAG	2000MHz System Validation Kit	D2000V2	1050	2024.10.22	2027.10.21
SPEAG	2450MHz System Validation Kit	D2450V2	805	2024.10.22	2027.10.21
SPEAG	2600MHz System Validation Kit	D2600V2	1198	2024.10.23	2027.10.22
SPEAG	5000MHz System Validation Kit	D5GHzV2	1176	2024.10.22	2027.10.21
SPEAG	DOSIMETRIC ASSESSMENT SYSTEM Software	DASY52	52.10.4.1527	NCR	NCR
SPEAG	Dosimetric E-Field Probe	EX3DV4	3823	2026.01.07	2027.01.06
SPEAG	Data Acquisition Electronics	DAE4	480	2026.01.07	2027.01.06
SPEAG	ELI V8.0 (20deg probe tilt)	QD OVA 004 Ax	N/A	NCR	NCR
SPEAG	Phone Positioner	N/A	N/A	NCR	NCR
R&S	Network Emulator	CMW500	165755	2025.12.23	2026.12.22
Anritsu	Network Emulator	MT8820C	6201274521	2025.12.24	2026.12.23
Agilent	Network Analyzer	E5071B	MY42404762	2025.12.24	2026.12.23
SPEAG	Dielectric Assessment KIT	DAK-3.5	1279	2025.03.18	2026.03.17
mini-circuits	Amplifier	ZHL-42W+	608501717	NCR	NCR
mini-circuits	Amplifier	ZVE-8G+	754401735	NCR	NCR
Agilent	Signal Generator	N5182B	MY53050509	2025.09.02	2026.09.01
R&S	Power Senor	NRP8S	103215	2025.12.24	2026.12.23
Agilent	Power Meter	E4416A	MY45102093	2025.09.02	2026.09.01
R&S	Power Sensor	NRP8S	103240	2025.12.24	2026.12.23
Anritsu	Power Meter	E4418B	GB43318055	2025.05.15	2026.05.14
Agilent	Dual Directional Coupler	778D	50422	NA	NA
MCL	Attenuation	351-218-010	N/A	NA	NA
R&S	Spectrum Analyzer	N9030A	MY54170556	2025.09.02	2026.09.01
KTJ	Thermo meter	TA298	N/A	2025.11.13	2026.11.12
SPEAG	Tissue Simulating Liquids	HBBL600-10000V6		24H	

Note:

1. The calibration certificate of DASY can be referred to annex F of this report.
2. The Insertion Loss calibration of Dual Directional Coupler and Attenuator were characterized via

the network analyzer and compensated during system check.

3. The dielectric probe kit was calibrated via the network analyzer, with the specified procedure (calibrated in pure water) and calibration kit (standard) short circuit, before the dielectric measurement. The specific procedure and calibration kit are provided by SPEAG.
4. In system check we need to monitor the level on the power meter, and adjust the power amplifier level to have precise power level to the dipole; the measured SAR will be normalized to 1 W input power according to the ratio of 1 W to the input power to the dipole. For system check, the calibration of the power amplifier is deemed not critically required for correct measurement; the power meter is critical and we do have calibration for it.
5. Attenuator insertion loss is calibrated by the network Analyzer, which the calibration is valid, before system check.
6. N.C.R means No Calibration Requirement.

7. Tissue Simulating Liquids

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

Fig 7.1 Photo of Liquid Height for Head SAR

Fig 7.2 Photo of Liquid Height for Body SAR

The following table gives the recipes for tissue simulating liquids

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

Simulating Liquid for 5GHz, Manufactured by SPEAG.

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

Note: Please refer to the validation results for dielectric parameters of each frequency band.
The dielectric properties of the tissue simulating liquids were verified prior to the SAR evaluation using a SPEAG Dielectric Assessment KIT and an Agilent Network Analyzer.

Table 1: Dielectric Performance of Tissue Simulating Liquid

Frequency (MHz)	Tissue Type	Liquid Temp. (℃)	Conductivity (σ)	Conductivity Target (σ)	Delta (σ) (%)	Limit (%)	Date
750	HSL	22.1	0.910	0.89	2.25	±5	2026/3/2
900	HSL	22.1	0.992	0.97	2.27	±5	2026/3/2
1800	HSL	22.3	1.421	1.40	1.50	±5	2026/3/3
2000	HSL	22.3	1.437	1.40	2.64	±5	2026/3/4
2450	HSL	22.1	1.818	1.80	1.00	±5	2026/3/5
2600	HSL	22.1	1.984	1.96	1.22	±5	2026/3/5
5250	HSL	22.3	4.838	4.71	2.72	±5	2026/3/3
5600	HSL	22.2	5.107	5.07	0.73	±5	2026/3/7
5750	HSL	22.2	5.373	5.22	2.93	±5	2026/3/7
Frequency (MHz)	**Tissue Type**	**Liquid Temp. (℃)**	**Permittivity (εr)**	**Permittivity Target (εr)**	**Delta (εr) (%)**	**Limit (%)**	**Date**
750	HSL	22.1	43.059	41.90	2.77	±5	2026/3/2
900	HSL	22.1	42.517	41.50	2.45	±5	2026/3/2
1800	HSL	22.3	40.962	40.00	2.41	±5	2026/3/3
2000	HSL	22.3	40.503	40.00	1.26	±5	2026/3/4
2450	HSL	22.1	39.963	39.20	1.95	±5	2026/3/5
2600	HSL	22.1	39.317	39.00	0.81	±5	2026/3/5
5250	HSL	22.3	36.612	35.95	1.84	±5	2026/3/3
5600	HSL	22.2	36.188	35.50	1.94	±5	2026/3/7
5750	HSL	22.2	35.965	35.35	1.74	±5	2026/3/7

8. SAR System Verification

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

8.1. Purpose of System Performance Check

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

8.2. System Setup

The output power on dipole port must be calibrated to 250 mW or 100 mW before dipole is connected. In the simplified setup for system evaluation, the DUT is replaced by a calibrated dipole and the power source is replaced by a continuous wave which comes from a signal generator. The calibrated dipole must be placed beneath the flat phantom section of the SAM twin phantom with the correct distance holder. The distance holder should touch the phantom surface with a light pressure at the reference marking and be oriented parallel to the long side of the phantom. The system check verifies that the system operates within its specifications. It is performed daily or before every SAR measurement. The system check uses normal SAR measurements in the flat section of the phantom with a matched dipole at a specified distance. The system verification setup is shown as below.

Fig 8.1 Photo of Dipole Setup

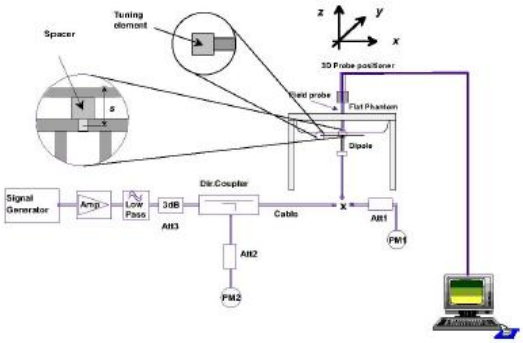


Fig 8.2 System Setup for System Evaluation

8.3. Validation Results

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

<Validation Setup>

Frequency (MHz)	Input Power (mW)	Dipole S/N	Probe S/N	DAE S/N
750	250	D750V3-1223	3823	480
900	250	D900V2-1d064	3823	480
1800	250	D1800V2-2d158	3823	480
2000	100	D2000V2-1050	3823	480
2450	100	D2450V2-805	3823	480
2600	100	D2600V2-1198	3823	480
5250	100	D5GHzV2-1176-5250	3823	480
5600	100	D5GHzV2-1176-5600	3823	480
5750	100	D5GHzV2-1176-5750	3823	480

<System Validation>

Frequency (MHz)	Tissue Type	Conductivity (σ)	Permittivity (εr)	CW Signal Validation		
				Sensitivity	Probe Linearity	Probe Isotropy
750	HSL	0.851	42.43	PASS	PASS	PASS
835	HSL	0.898	41.88	PASS	PASS	PASS
1750	HSL	1.386	39.91	PASS	PASS	PASS
1800	HSL	1.449	41.26	PASS	PASS	PASS
1900	HSL	1.435	39.65	PASS	PASS	PASS
2000	HSL	1.451	39.42	PASS	PASS	PASS
2300	HSL	1.764	38.99	PASS	PASS	PASS
2450	HSL	1.863	38.85	PASS	PASS	PASS
2600	HSL	1.973	38.58	PASS	PASS	PASS
3400	HSL	2.88	38.10	PASS	PASS	PASS
3500	HSL	2.91	37.90	PASS	PASS	PASS
3700	HSL	3.05	37.70	PASS	PASS	PASS
3900	HSL	3.15	37.50	PASS	PASS	PASS
4100	HSL	3.25	37.20	PASS	PASS	PASS
4200	HSL	3.34	37.00	PASS	PASS	PASS
4400	HSL	3.58	36.70	PASS	PASS	PASS

4600	HSL	3.70	36.60	PASS	PASS	PASS
4800	HSL	3.82	36.40	PASS	PASS	PASS
4900	HSL	3.96	36.20	PASS	PASS	PASS
5250	HSL	4.528	35.32	PASS	PASS	PASS
5600	HSL	4.905	34.89	PASS	PASS	PASS
5750	HSL	5.077	34.28	PASS	PASS	PASS

Frequency (MHz)	Tissue Type	Conductivity (σ)	Permittivity (εr)	Modulation Signal Validation		
				Mod. Type	Duty Factor	PAR
750	HSL	0.851	42.43	N/A	N/A	N/A
835	HSL	0.898	41.88	GMSK	PASS	N/A
1750	HSL	1.386	39.91	N/A	N/A	N/A
1800	HSL	1.449	41.26	N/A	N/A	N/A
1900	HSL	1.435	39.65	GMSK	PASS	N/A
2000	HSL	1.451	39.42	GMSK	PASS	N/A
2300	HSL	1.764	38.99	OFDM	PASS	PASS
2450	HSL	1.863	38.85	OFDM	PASS	PASS
2600	HSL	1.973	38.58	TDD	PASS	N/A
3400	HSL	2.88	38.10	OFDM	PASS	PASS
3500	HSL	2.91	37.90	OFDM	PASS	PASS
3700	HSL	3.05	37.70	OFDM	PASS	PASS
3900	HSL	3.15	37.50	OFDM	PASS	PASS
4100	HSL	3.25	37.20	OFDM	PASS	PASS
4200	HSL	3.34	37.00	OFDM	PASS	PASS
4400	HSL	3.58	36.70	OFDM	PASS	PASS
4600	HSL	3.70	36.60	OFDM	PASS	PASS
4800	HSL	3.82	36.40	OFDM	PASS	PASS
4900	HSL	3.96	36.20	OFDM	PASS	PASS
5250	HSL	4.528	35.32	OFDM	N/A	PASS
5600	HSL	4.905	34.89	OFDM	N/A	PASS
5750	HSL	5.077	34.28	OFDM	N/A	PASS

<Validation Results>

Date	Frequency (MHz)	Tissue Type	Measured 1g SAR (W/kg)	Targeted 1g SAR (W/kg)	Normalized 1g SAR (W/kg)	Deviation (%)
2026/3/2	750	HSL	2.32	8.58	9.28	8.16
2026/3/2	900	HSL	2.74	10.90	10.96	0.55
2026/3/3	1800	HSL	10.27	39.20	41.08	4.80
2026/3/4	2000	HSL	4.37	41.40	43.7	5.56
2026/3/5	2450	HSL	5.57	52.80	55.7	5.49
2026/3/5	2600	HSL	5.49	55.90	54.9	-1.79
2026/3/3	5250	HSL	7.69	77.30	76.9	-0.52
2026/3/7	5600	HSL	8.39	82.40	83.9	1.82
2026/3/7	5750	HSL	8.24	77.20	82.4	6.74

Date	Frequency (MHz)	Tissue Type	Measured 10g SAR (W/kg)	Targeted 10g SAR (W/kg)	Normalized 10g SAR (W/kg)	Deviation (%)
2026/3/2	750	HSL	1.46	5.65	5.84	3.36
2026/3/2	900	HSL	1.85	7.00	7.4	5.71
2026/3/3	1800	HSL	5.32	20.70	21.28	2.80
2026/3/4	2000	HSL	2.25	21.00	22.5	7.14
2026/3/5	2450	HSL	2.47	24.50	24.7	0.82
2026/3/5	2600	HSL	2.52	24.90	25.2	1.20
2026/3/3	5250	HSL	2.16	21.50	21.6	0.47
2026/3/7	5600	HSL	2.26	22.80	22.6	-0.88
2026/3/7	5750	HSL	2.25	21.20	22.5	6.13

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

9. EUT Testing Position

This EUT was tested in one position. It is front side of the EUT with phantom 0 mm gap, as illustrated below, please refer to annex B for the test setup photos.

9.1. Body-worn Configurations

The body-worn configurations shall be tested with the supplied accessories (belt-clips, holsters, etc.) attached to the device in normal use configuration.
For body-worn and other configurations a flat phantom shall be used which is comprised of material with electrical properties similar to the corresponding tissues.

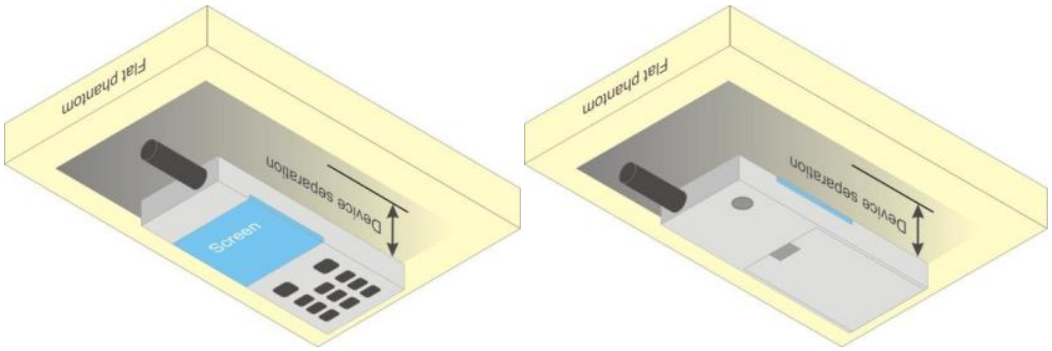


Fig 9.1 Illustration for Body Worn Position

10. Measurement Procedures

The measurement procedures are as follows:

<Conducted power measurement>

(a) For WWAN power measurement, use base station simulator to configure EUT WWAN transmission in conducted connection with RF cable, at maximum power in each supported wireless interface and frequency band.

(b) Read the WWAN RF power level from the base station simulator.

(c) For WLAN/BT power measurement, use engineering software to configure EUT WLAN/BT continuously transmission, at maximum RF power in each supported wireless interface and frequency band.

(d) Connect EUT RF port through RF cable to the power meter, and measure WLAN/BT output power.

<SAR measurement>

(a) Use base station simulator to configure EUT WWAN transmission in radiated connection, and engineering software to configure EUT WLAN/BT continuously transmission, at maximum RF power, in the highest power channel.

(b) Place the EUT in the positions as annex B demonstrates.

(c) Set scan area, grid size and other setting on the DASY software.

(d) Measure SAR results for the highest power channel on each testing position.

(e) Find out the largest SAR result on these testing positions of each band.

(f) Measure SAR results for other channels in worst SAR testing position if the reported SAR of highest power channel is larger than 0.8 W/kg.

According to the test standard, the recommended procedure for assessing the peak spatial-average SAR value consists of the following steps:

(a) Power reference measurement.

(b) Area scan.

(c) Zoom scan.

(d) Power drift measurement.

10.1. Spatial Peak SAR Evaluation

The procedure for spatial peak SAR evaluation has been implemented according to the test standard. It can be conducted for 1 g and 10 g, 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 1 g and 10 g 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 1 g and 10 g 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 1 g and 10 g.

10.2. Power Reference Measurement

The Power Reference Measurement and Power Drift Measurements are for monitoring the power drift of the device under test in the batch process. The minimum distance of probe sensors to surface determines the closest measurement point to phantom surface. This distance cannot be smaller than the distance of sensor calibration points to probe tip as defined in the probe properties.

10.3. Area Scan Procedures

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

When an Area Scan has measured all reachable points, it computes the field maxima founding the scanned area, within a range of the global maximum. The range (in dB) is specified in the standards for compliance testing. For example, a 2 dB range is required in IEEE 1528-2003.

10.4. Zoom Scan Procedures

Zoom Scans are used to assess the peak spatial SAR values within a cubic averaging volume containing 1 g and 10 g of simulated tissue. A density of 1000 kg/m³ is used to represent the head and body tissue density and not the phantom liquid density, in order to be consistent with the definition of the liquid dielectric properties, i.e. the side length of the 1 g cube is 10 mm, with the side

length of the 10 g cube 21.5 mm. The zoom scan integer steps can be user defined so as to reduce uncertainty, but normal practice for typical test applications utilize a physical step of 5 x 5 x 7 (8 mm x 8 mm x 5 mm) providing a volume of 32 mm in the X & Y axis, and 30 mm in the Z axis.

10.5. SAR Averaged Methods

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

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

10.6. Power Drift Monitoring

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

11. SAR Test Procedure

11.1. General Scan Requirements

Probe boundary effect error compensation is required for measurements with the probe tip closer than half a probe tip diameter to the phantom surface. Both the probe tip diameter and sensor offset distance must satisfy measurement protocols; to ensure probe boundary effect errors are minimized and the higher fields closest to the phantom surface can be correctly measured and extrapolated to the phantom surface for computing 1-g SAR. Tolerances of the post-processing algorithms must be verified by the test laboratory for the scan resolutions used in the SAR measurements, according to the reference distribution functions specified in IEEE Std. 1528-2013.

			≤ 3 GHz	> 3 GHz
Maximum distance from closest measurement point (geometric center of probe sensors) to phantom surface			5 mm ± 1 mm	½·δ·ln(2) mm ± 0.5 mm
Maximum probe angle from probe axis to phantom surface normal at the measurement location			30° ± 1°	20° ± 1°
Maximum area scan spatial resolution: Δx_{Area}, Δy_{Area}			≤ 2 GHz: ≤ 15 mm 2 – 3 GHz: ≤ 12 mm	3 – 4 GHz: ≤ 12 mm 4 – 6 GHz: ≤ 10 mm
			When the x or y dimension of the test device, in the measurement plane orientation, is smaller than the above, the measurement resolution must be ≤ the corresponding x or y dimension of the test device with at least one measurement point on the test device.	
Maximum zoom scan spatial resolution: Δx_{Zoom}, Δy_{Zoom}			≤ 2 GHz: ≤ 8 mm 2 – 3 GHz: ≤ 5 mm*	3 – 4 GHz: ≤ 5 mm* 4 – 6 GHz: ≤ 4 mm*
Maximum zoom scan spatial resolution, normal to phantom surface	uniform grid: $\Delta z_{Zoom}(n)$		≤ 5 mm	3 – 4 GHz: ≤ 4 mm 4 – 5 GHz: ≤ 3 mm 5 – 6 GHz: ≤ 2 mm
	graded grid	$\Delta z_{Zoom}(1)$: between 1st two points closest to phantom surface	≤ 4 mm	3 – 4 GHz: ≤ 3 mm 4 – 5 GHz: ≤ 2.5 mm 5 – 6 GHz: ≤ 2 mm
		$\Delta z_{Zoom}(n>1)$: between subsequent points	≤ 1.5·$\Delta z_{Zoom}(n-1)$ mm	
Minimum zoom scan volume	x, y, z		≥ 30 mm	3 – 4 GHz: ≥ 28 mm 4 – 5 GHz: ≥ 25 mm 5 – 6 GHz: ≥ 22 mm

Note: δ is the penetration depth of a plane-wave at normal incidence to the tissue medium; see IEEE Std 1528-2013 for details.

* When zoom scan is required and the *reported* SAR from the *area scan based 1-g SAR estimation* procedures of KDB Publication 447498 is ≤ 1.4 W/kg, ≤ 8 mm, ≤ 7 mm and ≤ 5 mm zoom scan resolution may be applied, respectively, for 2 GHz to 3 GHz, 3 GHz to 4 GHz and 4 GHz to 6 GHz.

11.2. Test Procedure

The Following steps are used for each test position

1. Establish a call with the maximum output power with a base station simulator. The connection between the mobile and the base station simulator is established via air interface.
2. Measurement of the local E-field value at a fixed location. This value serves as a reference value for calculating a possible power drift.
3. Measurement of the SAR distribution with a grid of 8 to 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.
4. Around this point, a cube of 30 * 30 * 30 mm or 32 * 32 * 32 mm is assessed by measuring 5 or 8 * 5 or 8*4 or 5 mm. With these data, the peak spatial-average SAR value can be calculated.

11.3. Description of Interpolation/Extrapolation Scheme

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

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

11.4. Wireless Router

Some battery-operated handsets have the capability to transmit and receive user through simultaneous transmission of WIFI simultaneously with a separate licensed transmitter. The FCC has provided guidance in FCC KDB Publication 941225 D06 v02r01 where SAR test considerations for handsets (L x W ≥ 9 cm x 5 cm) are based on a composite test separation distance of 10 from the front, back and edges of the device containing transmitting antennas within 2.5 cm of their edges,

determined form general mixed use conditions for this type of devices. Since the hotspot SAR results may overlap with the body-worn accessory SAR requirements, the more conservative configurations can be considered, thus excluding some body-worn accessory SAR tests.

When the user enables the personal wireless router functions for the handset, actual operations include simultaneous transmission of both the WIFI transmitter and another licensed transmitter. Both transmitters often do not transmit at the same transmitting frequency and thus cannot be evaluated for SAR under actual use conditions due to the limitations of the SAR assessment probes. Therefore, SAR must be evaluated for each frequency transmission and mode separately and spatially summed with the WIFI transmitter according to FCC KDB Publication 447498 D01v06 publication procedures. The “Portable Hotspot” feature on the handset was NOT activated during SAR assessments, to ensure the SAR measurements were evaluated for a single transmission frequency RF signal at a time.

12. SAR Test Configuration

<LTE Mode>

LTE Target MPR level

The device implements maximum power reduction per 3GPP 36.101 requirements where the MPR target is as below table. The MPR settings are implemented configured into firmware and cannot be disabled by the end user or LTE carrier network.

Modulation	Channel bandwidth / Transmission bandwidth configuration [RB]						MPR	3GPP
	1.4 MHz	3.0 MHz	5 MHz	10 MHz	15 MHz	20 MHz	Target (dB)	MPR (dB)
QPSK	> 5	> 4	> 8	> 12	> 16	> 18	1	≤ 1
16 QAM	≤ 5	≤ 4	≤ 8	≤ 12	≤ 16	≤ 18	1	≤ 1

Note: The measurement result showed some difference from the target MPR level, due to expected 0.5 dB measurement tolerance

LTE Bands

LTE Bands	Channel bandwidth / Transmission bandwidth configuration [RB]					
	1.4 MHz	3.0 MHz	5 MHz	10 MHz	15 MHz	20 MHz
2	√	√	√	√	√	√
4	√	√	√	√	√	√
5	√	√	√	√	N/A	N/A
7	N/A	N/A	√	√	√	√
12	√	√	√	√	N/A	N/A
13	N/A	N/A	√	√	N/A	N/A
25	√	√	√	√	√	√
38	N/A	N/A	√	√	√	√
41	N/A	N/A	√	√	√	√
66	√	√	√	√	√	√

Note:

1. Per KDB 941225 D05v02r05, when a properly configured base station simulator is used for the SAR and power measurements, spectrum plots for each RB allocation and offset configuration is not required.
2. Per KDB 941225 D05v02r05, start with the largest channel bandwidth and measure SAR for QPSK with 1 RB allocation, using the RB offset and required test channel combination with the highest maximum output power for RB offsets at the upper edge, middle and lower edge of each required test channel.
3. Per KDB 941225 D05v02r05, 50% RB allocation for QPSK SAR testing follows 1RB QPSK

allocation procedure.

4. Per KDB 941225 D05v02r05, for QPSK with 100% RB allocation, SAR is not required when the highest maximum output power for 100 % RB allocation is less than the highest maximum output power in 50% and 1 RB allocations and the highest reported SAR for 1 RB and 50% RB allocation are ≤ 0.8 W/kg. Otherwise, SAR is measured for the highest output power channel; and if the reported SAR is > 1.45 W/kg, the remaining required test channels must also be tested.
5. Per KDB 941225 D05v02r05, 16QAM/64QAM output power for each RB allocation configuration is > not ½ dB higher than the same configuration in QPSK and the reported SAR for the QPSK configuration is ≤ 1.45 W/kg; Per KDB941225 D05v02r05, 16QAM/64QAM SAR testing is not required.
6. Per KDB 941225 D05v02r05, smaller bandwidth output power for each RB allocation configuration is > not ½ Db higher than the same configuration in the largest supported bandwidth, and the reported SAR for the largest supported band width is ≤ 1.45 W/kg; Per KDB 941225 D05v02r05, smaller bandwidth SAR testing is not required.
7. For LTE B4 / B5 / B7 / B17 the maximum bandwidth does not support three non-overlapping channels, per KDB941225 D05v02r05, when a device supports overlapping channel assignment in a channel bandwidth configuration, the middle channel of the group of overlapping channels should be selected for testing.
8. LTE band 2 / 12 SAR test was covered by Band 25 / 17; according to April 2015 TCB workshop, SAR test for overlapping LTE bands can be reduced if
   a. The maximum output power, including tolerance, for the smaller band is ≤ the larger band to qualify for the SAR test exclusion.
   b. The channel bandwidth and other operating parameters for the smaller band are fully supported by the larger band.
9. According to 2017 TCB workshop, for 64 QAM and 16 QAM should be verified by checking the signal constellation with a call box to avoid incorrect maximum power levels due to MPR and other requirements associated with signal modulation, and the following figure is taken from the "Fundamental Measurement >> Modulation Analysis >>constellation" mode of the device connect to the CMW500 base station, therefore, the device 64QAM and 16QAMsignal modulation are correct. Identify if Maximum Power Reduction (MPR) is optional or mandatory, i.e. built-in by design: only mandatory MPR may be considered during SAR testing, when the maximum output power is permanently limited by the MPR implemented within the UE; and only for the applicable RB (resource block) configurations specified in LTE standards: b) A-MPR (additional MPR) must be disabled.
10. Per KDB 447498 D01v06, the reported SAR is the measured SAR value adjusted for maximum tune-up tolerance.
    a. Tune-up scaling Factor = tune-up limit power (mW) / EUT RF power (mW), where tune-up limit is the maximum rated power among all production units.
    b. For SAR testing of WLAN signal with non-100% duty cycle, the measured SAR is scaled-up

by the duty cycle scaling factor which is equal to "1/ (duty cycle)"

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

d. For WLAN/Bluetooth: Reported SAR (W/kg) = Measured SAR(W/kg) * Duty Cycle scaling factor * Tune-up scaling factor

e. For TDD LTE SAR measurement, the duty cycle 1:1.59 (62.9 %) was used perform testing and considering the theoretical duty cycle of 63.3% for extended cyclic prefix in the uplink, and the theoretical duty cycle of 62.9% for normal cyclic prefix in uplink, a scaling factor of extended cyclic prefix 63.3%/62.9% = 1.006 is applied to scale-up the measured SAR result. The Reported TDD LTE SAR = measured SAR (W/kg) * Tune-up Scaling Factor* scaling factor for extended cyclic prefix.

11. Per KDB 447498 D01v06, for each exposure position, testing of other required channels within the operating mode of a frequency band is not required when the reported 1-g or 10-g SAR for the mid-band or highest output power channel is:≤ 0.8 W/kg or 2.0 W/kg, for 1-g or 10-g respectively, when the transmission band is ≤ 100 MHz≤ 0.6 W/kg or 1.5 W/kg, for 1-g or 10-g respectively, when the transmission band is between 100 MHz and 200 MHz≤ 0.4 W/kg or 1.0 W/kg, for 1-g or 10-g respectively, when the transmission band is ≥ 200 MHz
12. Per KDB 865664 D01v01r04, for each frequency band, repeated SAR measurement is required only when the measured SAR is ≥0.8W/kg.
13. Per KDB 648474 D04v01r03, when the reported SAR for a body-worn accessory measured without a headset connected to the handset is ≤ 1.2 W/kg, SAR testing with a headset connected to the handset is not required.

<WLAN 2.4GHz>

1. SAR is measured for 2.4 GHz 802.11b DSSS using either the fixed test position or, when applicable, the initial test position procedure. SAR test reduction is determined according to the following:
   a. When the reported SAR of the highest measured maximum output power channel for the exposure configuration is ≤ 0.8 W/kg, no further SAR testing is required for 802.11b DSSS in that exposure configuration.
   b. When the reported SAR is > 0.8 W/kg, SAR is required for that position using the next highest measured output power channel. When any reported SAR is > 1.2 W/kg, SAR is required for the third channel; i.e., all channels require testing.
2. 2.4 GHz 802.11 g/n OFDM are additionally evaluated for SAR if the highest reported SAR for 802.11b, adjusted by the ratio of the OFDM to DSSS specified maximum output power, is > 1.2 W/kg. When SAR is required for OFDM modes in 2.4 GHz band, the Initial Test configuration Procedures should be followed.
3. For held-to-ear and hotspot operations, the initial test position procedures were applied. The test position with the highest extrapolated peak SAR will be used as the initial test position. When reported SAR for the initial test position is ≤ 0.4 W/kg, no additional testing for the remaining

test positions was required. Otherwise, SAR is evaluated at the subsequent highest peak SAR positions until the reported SAR result is ≤ 0.8 W/kg or all test positions are measured.

4. Justification for test configurations for WLAN per KDB Publication 248227 D02DR02-41929 for 2.4 GHz WI-FI single transmission chain operations, the highest measured maximum output power channel for DSSS was selected for SAR measurement. SAR for OFDM modes (2.4 GHz802.11g/n) was not required due to the maximum allowed powers and the highest reported DSSSSAR.
5. A fixed level power reduction is applied for WiFi when handset operates "held to the body" condition or "held to the ear" condition, the power reduction triggered by audio receiver detection and call establish status.
6. Per KDB 248227 D01v02r02, In the 2.4 GHz band, separate SAR procedures are applied to DSSS and OFDM configurations to simplify DSSS test requirements.SAR is not required for the following 2.4 GHz OFDM conditions:
   a. When KDB Publication 447498 SAR test exclusion applies to the OFDM configuration.
   b. When the highest reported SAR for DSSS is adjusted by the ratio of OFDM to DSSS specified maximum output power and the adjusted SAR is ≤ 1.2 W/kg.

<WLAN 5GHz>

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

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

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

required when the 160 MHz channel is operating at a reduced maximum power and also qualifies for SAR test exclusion.

B) U-NII-2C and U-NII-3 Bands

The frequency range covered by these bands is 380 MHz (5.47 – 5.85 GHz), which requires a minimum of at least two SAR probe calibration frequency points to support SAR measurements. when Terminal Doppler Weather Radar (TDWR) restriction applies, all channels that operate at 5.60 – 5.65 GHz must be included to apply the SAR test reduction and measurement procedures.
When the same transmitter and antenna(s) are used for U-NII-2C band and U-NII-3 band or 5.8 GHz band of §15.247, the bands may be aggregated to enable additional channels with 20, 40 or 80 MHz bandwidth to span across the band gap, as illustrated in Appendix B. The maximum output power for the additional band gap channels is limited to the lower of those certified for the bands. Unless band gap channels are permanently disabled, they must be considered for SAR testing. The frequency range covered by these bands is 380 MHz (5.47 – 5.85 GHz), which requires a minimum of at least two SAR probe calibration frequency points to support SAR measurements. To maintain SAR measurement accuracy and to facilitate test reduction, the channels in U-NII-2C band above 5.65 GHz may be grouped with the 5.8 GHz channels in U-NII-3 or §15.247 band to enable two SAR probe calibration frequency points to cover the bands, including the band gap channels. When band gap channels are supported and the bands are not aggregated for SAR testing, band gap channels must be considered independently in each band according to the normally required OFDM SAR measurement and probe calibration frequency points requirements.

C) OFDM Transmission Mode SAR Test Configuration and Channel Selection Requirements

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

1. The largest channel bandwidth configuration is selected among the multiple configurations with the same specified maximum output power.
2. If multiple configurations have the same specified maximum output power and largest channel bandwidth, the lowest order modulation among the largest channel bandwidth configurations is selected.
3. If multiple configurations have the same specified maximum output power, largest channel band width and lowest order modulation, the lowest data rate configuration among these configurations is selected.

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

D) SAR Test Requirements for OFDM configurations

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

13. Conducted Power List

➢ **Remark:**

1. The output power of WLAN/Bluetooth was recorded to the annex E of this report.
2. The output power of LTE was recorded to the report W7L-P23070009RF01/F02/F03/F04.

➢ **Bluetooth Body SAR**

1. For 100 MHz to 6 GHz and test separation distances ≤ 50 mm, the 1-g and 10-g SAR test exclusion thresholds are determined by the following:

$$\sqrt{f(GHz)} * \frac{\text{Max. power of channel, mW}}{\text{Min. Separation Distance, mm}} \leqslant 3.0 \text{ (for 1-g extremity SAR)}$$

$$\sqrt{f(GHz)} * \frac{\text{Max. power of channel, mW}}{\text{Min. Separation Distance, mm}} \leqslant 7.5 \text{ (for 10-g extremity SAR)}$$

2. According to FCC KDB 447498 D01v06 Section 4.3 a), when the minimum test separation distance is < 5 mm, a distance of 5 mm is applied to determine SAR test exclusion.

Channel	Frequency (MHz)	Max. Tune-up Power (dBm)	Max. Power (mW)	Test Distance (mm)	Result	Exclusion Thresholds for 1g SAR
CH 39	2480	3.00	2.00	5	0.63	3.0

Note: The calculation result for Bluetooth is 0.63, which is below the 1g SAR exemption threshold. Therefore, Bluetooth is exempt from testing.

3. Per FCC KDB 447498 D01v06 Section 4.3.2, when an antenna qualifies for the standalone SAR test exclusion of 4.3.1 and also transmits simultaneously with other antennas, the following equation must be used to estimate the standalone 1g/10g SAR.

$$\text{Estimated SAR} = \frac{\sqrt{f(GHz)}}{7.5} * \frac{\text{Max power of channel,mW}}{\text{Min Separation Distance,mm}} \text{ (for 1-g extremity SAR)}$$

$$\text{Estimated SAR} = \frac{\sqrt{f(GHz)}}{18.75} * \frac{\text{Max power of channel,mW}}{\text{Min Separation Distance,mm}} \text{ (for 10-g extremity SAR)}$$

Mode	Max. Tune-up Power (dBm)	Exposure Position	Body
		Test Distance (mm)	5
Bluetooth	3.00	Estimated SAR (W/kg)	0.084

Note: The estimated SAR is used only to determine simultaneous transmission SAR test exemption; it shall not be reported as the standalone SAR.

14. Exposure Positions Consideration

➢ **EUT Antenna Location**

The location of antenna was recorded in annex B
4G Antenna: TX: LTE Band 2/4/5/7/12/13/25/38/41/66 WIFI Antenna: TX: WLAN 2.4GHz, WLAN 5GHz BT Antenna: TX: Bluetooth

➢ **EUT Antenna Distance**

Antenna	Antenna distance to surface or edges (mm)					
	Front	Back	Left	Right	Top	Bottom
4G Antenna	<25	>25	>25	>25	>25	>25
WIFI Antenna	<25	>25	>25	>25	>25	>25
BT Antenna	<25	>25	>25	>25	>25	>25

➢ **Body Evaluation**

Assessment	Body Side for SAR Test Distance: 0 mm					
Antenna	Front	Back	Left	Right	Top	Bottom
4G Antenna	Yes	No	No	No	No	No
WIFI Antenna	Yes	No	No	No	No	No
BT Antenna	Yes	No	No	No	No	No

Note :

1. The SAR evaluation procedures for Portable Devices with Wireless Router function is according to KDB 941225 D06 Hotspot SAR v02r01.
2. Body mode SAR assessments are required.
3. Referring to KDB 941225 D06, when the overall device length and width are ≥ 9 cm * 5 cm, the test distance is 10 mm. SAR must be measured for all sides and surfaces with a transmitting antenna located within 25 mm from that surface or edge. As the front side of the product is subject to direct contact during application, the test distance is 0 mm, and testing is limited to the front side.

15. Block Diagram of the Tests to be Performed

15.1. Body

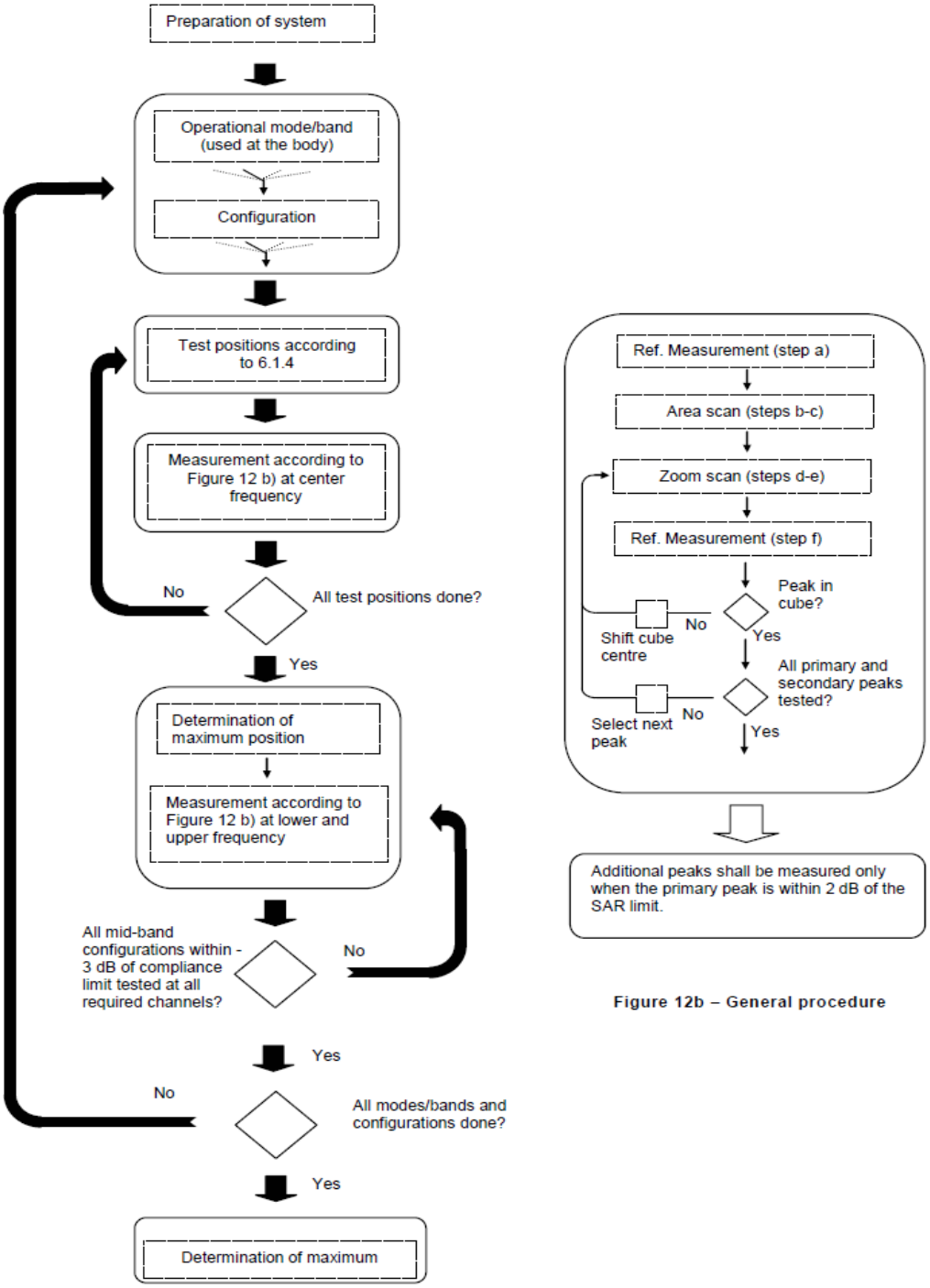


Figure 12b – General procedure

16. Test Results List

16.1. Test Guidance

1. Per KDB 447498 D01v06, the reported SAR is the measured SAR value adjusted for maximum tune-up tolerance.
   a. Tune-up scaling Factor = tune-up limit power (mW) / EUT RF power (mW), where tune-up limit is the maximum rated power among all production units.
   b. For SAR testing of WLAN signal with non-100% duty cycle, the measured SAR is scaled-up by the duty cycle scaling factor which is equal to "1 / (duty cycle)".
   c. For WWAN: Reported SAR (W/kg) = Measured SAR (W/kg) * Tune-up Scaling Factor.
   d. For WLAN/Bluetooth: Reported SAR (W/kg) = Measured SAR (W/kg) * Duty Cycle scaling factor * Tune-up scaling factor.
2. Per KDB 447498 D01v06, for each exposure position, testing of other required channels within the operating mode of a frequency band is not required when the *reported* 1-g or 10-g SAR for the mid-band or highest output power channel is:
   a. ≤ 0.8 W/kg or 2.0 W/kg, for 1-g or 10-g respectively, when the transmission band is ≤ 100 MHz
   b. ≤ 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
   c. ≤ 0.4 W/kg or 1.0 W/kg, for 1-g or 10-g respectively, when the transmission band is ≥ 200 MHz
3. Per KDB 865664 D01v01r04, for each frequency band, repeated SAR measurement is required only when the measured SAR is ≥ 0.8W/kg.
4. Per KDB 648474 D04v01r03, when the reported SAR for a body-worn accessory measured without a headset connected to the handset is ≤ 1.2 W/kg, SAR testing with a headset connected to the handset is not required.
5. Per KDB648474 D04v01r03, for smart phones with a display diagonal dimension > 15.0 cm or an overall diagonal dimension > 16.0 cm, when hotspot mode applies, 10-g extremity SAR is required only for the surfaces and edges with hotspot mode 1-g reported SAR > 1.2 W/kg, however, when power reduction applies to hotspot mode the measured SAR must be scaled to the maximum output power, including tolerance, allowed for tablet modes to compare with the 1.2 W/kg SAR test reduction threshold.
6. Per KDB248227 D01v02r02, a Wi-Fi device must be configured to transmit continuously at the required data rate, channel bandwidth and signal modulation, using the highest transmission duty factor supported by the test mode tools for SAR measurement. The test frequencies established using test mode must correspond to the actual channel frequencies required for operations in the U.S. When 802.11 frame gaps are accounted for in the transmission, a maximum transmission duty factor of 92 - 96% is typically achievable in most test mode configurations. A minimum transmission duty factor of 85% is required to avoid certain hardware and device implementation issues related to wide range SAR scaling. In addition, a periodic

transmission duty factor is required for current generation SAR systems to measure SAR correctly. Unless it is permitted by specific KDB procedures or continuous transmission is specifically restricted by the device, the reported SAR must be scaled to 100% transmission duty factor to determine compliance at the maximum tune-up tolerance limit. When a device is not capable of sustaining continuous transmission or the output can become nonlinear, and it is limited by hardware design and unable to transmit at higher than 85% duty factor, a periodic duty factor within 15% of the maximum duty factor the device is capable of transmitting should be used. The reported SAR must be scaled to the maximum transmission duty factor to determine compliance. Descriptions of the procedures applied to establish the specific duty factor used for SAR testing are required in SAR reports to support the test results.

16.2. Body SAR Data

➢ **LTE QPSK Body SAR**

Plot No.	Band/Mode	Test Position	CH.	Ave. Power (dBm)	Tune-up Limit (dBm)	Tune-up Scaling Factor	Meas. SAR_{1g} (W/kg)	Reported SAR_{1g} (W/kg)
	LTE Band 5/1RB#0 10M	Front Side	20600	23.30	24.00	1.175	0.009	0.011
	LTE Band 5/25RB#25 10M	Front Side	20450	22.30	23.00	1.175	0.003	0.004
	LTE Band 7/1RB#99 20M	Front Side	20850	24.58	25.50	1.236	0.037	0.045
	LTE Band 7/50RB#50 20M	Front Side	20850	23.59	24.50	1.233	0.015	0.018
	LTE Band 12/1RB#49 10M	Front Side	23060	24.07	25.00	1.239	0.009	0.011
	LTE Band 12/25RB#25 10M	Front Side	23095	22.95	23.50	1.135	0.004	0.005
	LTE Band 13/1RB#0 10M	Front Side	23230	23.55	24.50	1.245	0.016	0.020
	LTE Band 13/25RB#0 10M	Front Side	23230	22.39	23.00	1.151	0.012	0.014
1#	LTE Band 25/1RB#50 20M	Front Side	26140	24.77	25.50	1.183	0.055	0.065
	LTE Band 25/50RB#25 20M	Front Side	26140	23.43	24.00	1.140	0.026	0.030
	LTE Band 41/1RB#0 20M	Front Side	40620	22.55	23.50	1.245	0.042	0.052
	LTE Band 41/50RB#50 20M	Front Side	39750	21.81	22.50	1.172	0.022	0.026
	LTE Band 66/1RB#0 20M	Front Side	132072	23.46	24.50	1.271	0.024	0.030
	LTE Band 66/50RB#0 20M	Front Side	132072	22.5	23.00	1.122	0.017	0.019

➢ **WLAN Body SAR**

Plot No.	Band/Mode	Test Position	CH.	Ave. Power (dBm)	Tune-up Limit (dBm)	Tune-up Scaling Factor	Meas. SAR_{1g} (W/kg)	Reported SAR_{1g} (W/kg)
2#	WLAN2.4GHz/802.11b	Front Side	13	17.1	18.00	1.230	0.060	0.075
	WLAN5.2GHz/802.11a	Front Side	48	14.07	15.00	1.239	0.069	0.089
	WLAN5.3GHz/802.11ac20	Front Side	56	15.21	16.00	1.199	0.074	0.091
3#	WLAN5.5GHz/802.11a	Front Side	118	18.43	19.00	1.140	0.085	0.102
	WLAN5.8GHz/802.11a	Front Side	157	17.08	18.00	1.236	0.073	0.093

Note: The 2.4G WLAN reported 1g SAR (W/kg) should be scaled with the duty cycle scaling factor 1.005, 1.039 for WLAN 5.2GHz 802.11a, 1.021 for WLAN 5.3GHz 802.11ac-VHT20, 1.049 for WLAN 5.5GHz 802.11a, and 1.029 for WLAN 5.8GHz 802.11a.

17. Simultaneous Transmission Evaluation

17.1. Simultaneous Transmission Consideration

No.	Simultaneous Transmission Consideration	Body
1	WWAN+WLAN 2.4GHz/5GHz	Yes
2	WWAN+Bluetooth	Yes
3	WWAN+WLAN 2.4GHz+Bluetooth	Yes
4	WWAN+WLAN 5GHz+Bluetooth	Yes

Note: Per KDB 447498D01v06, simultaneous transmission SAR evaluation procedures is as followed:

Step 1: If sum of 1 g SAR < 1.6 W/kg, Simultaneous SAR measurement is not required.

Step 2: If sum of 1 g SAR > 1.6 W/kg, ratio of SAR to peak separation distance for pair of transmitters calculated.

Step 3: If the ratio of SAR to peak separation distance is ≤ 0.04, Simultaneous SAR measurement is not required.

Step 4: If the ratio of SAR to peak separation distance is > 0.04, Simultaneous SAR measurement is required and simultaneous transmission SAR value is calculated.

(The ratio is determined by: $(SAR_1 + SAR_2)$ ^ 1.5 / $R_i \leq 0.04$,

Ri is the separation distance between the peak SAR locations for the antenna pair in mm.

17.2. Simultaneous Transmission Analysis

➢ **Body Simultaneous Transmission for WWAN + WLAN 2.4GHz + Bluetooth**

WWAN Band	Exposure Position	1	2	3	1+2+3 Summed 1g SAR (W/kg)
		WWAN	2.4GHz WLAN	Bluetooth (Estimated)	
		1g SAR (W/kg)	1g SAR (W/kg)	1g SAR (W/kg)	
LTE Band 5	Front Side	0.011	0.075	0.084	0.170
LTE Band 7	Front Side	0.045	0.075	0.084	0.204
LTE Band 12	Front Side	0.011	0.075	0.084	0.170
LTE Band 13	Front Side	0.02	0.075	0.084	0.179
LTE Band 25/2	Front Side	0.065	0.075	0.084	0.224
LTE Band 41/38	Front Side	0.052	0.075	0.084	0.211
LTE Band 66/4	Front Side	0.03	0.075	0.084	0.189

➢ **Body Simultaneous Transmission for WWAN + WLAN 5GHz + Bluetooth**

WWAN Band	Exposure Position	1	2	3	1+2+3 Summed 1g SAR (W/kg)
		WWAN	5GHz WLAN	Bluetooth (Estimated)	
		1g SAR (W/kg)	1g SAR (W/kg)	1g SAR (W/kg)	
LTE Band 5	Front Side	0.011	0.102	0.084	0.197
LTE Band 7	Front Side	0.045	0.102	0.084	0.231
LTE Band 12	Front Side	0.011	0.102	0.084	0.197
LTE Band 13	Front Side	0.02	0.102	0.084	0.206
LTE Band 25/2	Front Side	0.065	0.102	0.084	0.251
LTE Band 41/38	Front Side	0.052	0.102	0.084	0.238
LTE Band 66/4	Front Side	0.03	0.102	0.084	0.216

18. Uncertainty Assessment

According to KDB 865664 D01 SAR measurement 100 MHz to 6GHz, when the highest measured 1-g SAR is less than 1.5 W/kg and 10-g extremity SAR less than 3.75 W/kg, the expanded SAR measurement uncertainty must be less than 30% with a confidence interval of k=2. When these conditions are met, extensive SAR measurement uncertainty analysis described in IEEE 1528-2013 is not required in the SAR report and submitted for equipment approval. For this device, both the 1-g SAR is less than 1.5 W/kg. Therefore the measurement uncertainty table is not required in this report.

Annex A General Information

1. Identification of the Responsible Testing Laboratory

Laboratory Name:	Shenzhen Morlab Communications Technology Co., Ltd.
Laboratory Address:	FL.1-3, Building A, FeiYang Science Park, No.8 LongChang Road, Block 67, BaoAn District, ShenZhen, GuangDong Province, P. R. China
Telephone:	+86 755 36698555
Facsimile:	+86 755 36698525

2. Identification of the Responsible Testing Location

Name:	Shenzhen Morlab Communications Technology Co., Ltd.
Address:	FL.1-3, Building A, FeiYang Science Park, No.8 LongChang Road, Block 67, BaoAn District, ShenZhen, GuangDong Province, P. R. China

3. Facilities and Accreditations

The FCC designation number is CN1192, the test firm registration number is 226174.

Annex B Test Setup Photos

The annex B will be submitted separately.

Annex C Plots of System Performance Check

The annex C will be submitted separately.

Annex D Plots of Maximum SAR Test Results

The annex D will be submitted separately.

Annex E Conducted Power

The annex E will be submitted separately.

Annex F DASY Calibration Certificate

The annex F will be submitted separately.

Notes

1. The report shall have report stamp or our company stamp.
2. The report shall be invalid without all the signatures of the editor and approver.
3. The report shall not be changed.
4. Any objections must be raised to Morlab within 15 days since the date when the report is received. It will not be taken into consideration beyond this limit.
5. Conformity declaration:
   ☑ Morlab issues a statement of conformity based on the corresponding standards（default）
   ☐ Morlab issues a statement of conformity based on the applicant requirement
6. Use of uncertainty of measurement for decisions on conformity (decision rule):
   No decision rule is specified by the testing standard, when comparing the measurement result with the applicable limit according to the specification in that standard. The decisions on conformity are made without applying the measurement uncertainty (“simple acceptance” decision rule).

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