



ELEMENT MATERIALS TECHNOLOGY

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SAR EVALUATION REPORT

Applicant Name:
Apple, Inc.
One Apple Park Way
Cupertino, CA 95014 USA

Date of Testing:
06/12/2024 - 07/10/2024
Test Report Issue Date:
08/06/2024
Test Site/Location:
Element, Morgan Hill, CA, USA
Document Serial No.:
1C2405230019-01.BCG (Rev 1)

FCC ID: BCG-A2997

APPLICANT: APPLE, INC.

DUT Type: Watch
Application Type: Certification
FCC Rule Part(s): CFR §2.1093
Model: A2997, A2998

Equipment Class	Band & Mode	Tx Frequency	SAR	
			1g Head (W/kg)	10g Extremity (W/kg)
DTS	2.4 GHz WiFi	2412 - 2472 MHz	0.56	<0.1
NII	5 GHz WiFi	U-NII-1: 5180 - 5240 MHz U-NII-2A: 5260 - 5320 MHz U-NII-2C: 5600 - 5720 MHz U-NII-3: 5745 - 5825 MHz	0.26	<0.1
DSS/OTS	2.4 GHz Bluetooth	2402 - 2480 MHz	0.41	<0.1
NII	802.15.4 ab-NB	5728.75 - 5846.25 MHz	<0.1	<0.1
DXC	NFC	13.56 MHz	N/A	<0.1
UWB	UWB	6489.6 - 7987.2 MHz	N/A	<0.1
Simultaneous SAR per KDB 690783 D01v01r03:			0.67	<0.1
Equipment Class	Band & Mode	Tx Frequency	APD (W/m²)	APD (W/m²)
UWB	UWB	6489.6 - 7987.2 MHz	N/A	<0.1
Equipment Class	Band & Mode	Tx Frequency	Reported PD (W/m²)	Reported PD (W/m²)
UWB	UWB	6489.6 - 7987.2 MHz	N/A	0.60

Note: This revised Test Report supersedes and replaces the previously issued test report on the same subject device for the same type of testing as indicated. Please discard or destroy the previously issued test report(s) and dispose of it accordingly.

This watch has been shown to be capable of compliance for localized specific absorption rate (SAR) for uncontrolled environment/general population exposure limits specified in ANSI/IEEE C95.1-1992 and has been tested in accordance with the measurement procedures specified in Section 0 of this report; for North American frequency bands only.

I attest to the accuracy of data. All measurements reported herein were performed by me or were made under my supervision and are correct to the best of my knowledge and belief. I assume full responsibility for the completeness of these measurements and vouch for the qualifications of all persons taking them. Test results reported herein relate only to the item(s) tested.

RJ Ortanez
Executive Vice President



The SAR Tick is an initiative of the Mobile & Wireless Forum (MWF). While a product may be considered eligible, use of the SAR Tick logo requires an agreement with the MWF. Further details can be obtained by emailing: sartick@mwfai.info.

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1 DEVICE UNDER TEST

1.1 Device Overview

Band & Mode	Operating Modes	Tx Frequency
2.4 GHz WLAN	Voice/Data	2412 - 2472 MHz
5 GHz WIFI	Voice/Data	U-NII-1: 5180 - 5240 MHz U-NII-2A: 5260 - 5320 MHz U-NII-2C: 5500 - 5720 MHz U-NII-3: 5745 - 5825 MHz
Bluetooth	Data	2402 - 2480 MHz
802.15.4 ab-NB	Data	5728.75 - 5846.25 MHz
UWB	Data	6489.6 - 7987.2 MHz
NFC	Data	13.56 MHz

1.2 Power Reduction for SAR

There is no power reduction used for any band/mode implemented in this device for SAR purposes.

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1.3 Nominal and Maximum Output Power Specifications

This device operates using the following maximum and nominal output power specifications. SAR values were scaled to the maximum allowed power to determine compliance per KDB Publication 447498 D04v01.

1.3.1 Maximum Output Power – WiFi Mode

Mode/ Band			IEEE 802.11b (2.4 GHz)		IEEE 802.11g (2.4 GHz)		IEEE 802.11n (2.4 GHz)	
		Channel	Maximum	Nominal	Maximum	Nominal	Maximum	Nominal
Modulated Average - Single Tx Chain (dBm)	20 MHz Bandwidth	1	20.00	19.00	17.00	16.00	17.00	16.00
		2	20.00	19.00	19.00	18.00	19.00	18.00
		3	20.00	19.00	19.00	18.00	19.00	18.00
		4	20.00	19.00	19.00	18.00	19.00	18.00
		5	20.00	19.00	19.00	18.00	19.00	18.00
		6	20.00	19.00	19.00	18.00	19.00	18.00
		7	20.00	19.00	19.00	18.00	19.00	18.00
		8	20.00	19.00	19.00	18.00	19.00	18.00
		9	20.00	19.00	19.00	18.00	19.00	18.00
		10	20.00	19.00	19.00	18.00	19.00	18.00
		11	20.00	19.00	16.50	15.50	16.50	15.50
		12	20.00	19.00	15.00	14.00	15.00	14.00
		13	18.00	17.00	2.50	1.50	2.50	1.50

Mode/ Band			IEEE 802.11a (5 GHz)		IEEE 802.11n (5 GHz)	
		Channel	Maximum	Nominal	Maximum	Nominal
Modulated Average - Single Tx Chain (dBm)	20 MHz Bandwidth	36	17.00	16.00	17.00	16.00
		40	17.00	16.00	17.00	16.00
		44	17.00	16.00	17.00	16.00
		48	17.00	16.00	17.00	16.00
		52	17.00	16.00	17.00	16.00
		56	17.00	16.00	17.00	16.00
		60	17.00	16.00	17.00	16.00
		64	17.00	16.00	17.00	16.00
		100	17.00	16.00	17.00	16.00
		104	17.00	16.00	17.00	16.00
		108	17.00	16.00	17.00	16.00
		112	17.00	16.00	17.00	16.00
		116	17.00	16.00	17.00	16.00
		120	17.00	16.00	17.00	16.00
		124	17.00	16.00	17.00	16.00
		128	17.00	16.00	17.00	16.00
		132	17.00	16.00	17.00	16.00
		136	17.00	16.00	17.00	16.00
		140	13.50	12.50	13.50	12.50
		144	17.00	16.00	17.00	16.00
		149	17.00	16.00	17.00	16.00
		153	17.00	16.00	17.00	16.00
		157	17.00	16.00	17.00	16.00
		161	17.00	16.00	17.00	16.00
		165	17.00	16.00	17.00	16.00

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1.3.2 Maximum Output Power – Bluetooth Mode

Mode / Band		Modulated Average - Single Tx Chain (dBm)
Bluetooth BDR/LE	Maximum	19.00
	Nominal	18.00
Bluetooth EDR	Maximum	14.50
	Nominal	13.50
Bluetooth HDR	Maximum	14.50
	Nominal	13.50

1.3.3 Maximum Output Power – 802.15.4 ab-NB

Mode / Band		Modulated Average - Single Tx Chain (dBm)
802.15.4 ab-NB	Maximum	16.00
	Nominal	14.00

1.4 DUT Antenna Locations

A diagram showing the location of the device antennas can be found in the DUT Antenna Diagram & SAR Test Setup Photographs Appendix.

1.5 Near Field Communications (NFC) Antenna

This DUT has NFC operations. The NFC antenna is integrated into the device for this model. Therefore, all SAR tests were performed with the device which already incorporates the NFC antenna. A diagram showing the location of the NFC antenna can be found in the DUT Antenna Diagram & SAR Test Setup Photographs Appendix.

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1.6 Simultaneous Transmission Capabilities

According to FCC KDB Publication 447498 D04v01, transmitters are considered to be operating simultaneously when there is overlapping transmission, with the exception of transmissions during network hand-offs with maximum hand-off duration less than 30 seconds.

This device contains multiple transmitters that may operate simultaneously, and therefore requires a simultaneous transmission analysis according to FCC KDB Publication 447498 D04v01 procedures.

Table 1-1
Simultaneous Transmission Scenarios

No.	Capable Transmit Configuration	Head	Extremity
1	2.4 GHz WI-FI + 802.15.4 ab-NB + NFC	Yes*	Yes
2	2.4 GHz WI-FI + UWB + NFC	Yes*	Yes
3	2.4 GHz Bluetooth + 5 GHz WI-FI + NFC	Yes*	Yes
4	2.4 GHz Bluetooth + 802.15.4 ab-NB + NFC	Yes*	Yes
5	2.4 GHz Bluetooth + UWB + NFC	Yes*	Yes

1. 2.4 GHz WLAN and 2.4 GHz Bluetooth cannot transmit simultaneously.
2. 2.4 GHz WLAN and 5 GHz WLAN cannot transmit simultaneously.
3. 802.15.4 ab-NB, 5 GHz WLAN and UWB cannot transmit simultaneously.
4. This device supports VoWiFi.
5. *UWB and NFC were evaluated for extremity based on expected usage conditions.

1.7 Miscellaneous SAR Test Considerations

(A) WIFI/BT

This device supports channel 1-13 for 2.4 GHz WLAN. However, because channel 12/13 targets are not higher than that of channels 1-11, channels 1, 6, and 11 were considered for SAR testing per FCC KDB 248227 D01V02r02.

Since U-NII-1 and U-NII-2A bands have the same maximum output power and the highest reported SAR for U-NII-2A is less than 1.2 W/kg, SAR is not required for U-NII-1 band according to FCC KDB Publication 248227 D01v02r02.

Per FCC guidance, SAR was performed using 8 GHz SAR probe calibration factors for UWB. Absorbed power density (APD) using a 4cm² averaging area is reported based on SAR measurements. Incident power density is evaluated at 2mm ensuring that the resolution is sufficient such that integrated power density (IPD) between d=2mm and d=λ/5mm is $\geq -1\text{dB}$ per equipment manufacturer guidance. Power density results are scaled up for uncertainty above 30%.

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1.8 Guidance Applied

- FCC KDB Publication 248227 D01v02r02 (SAR Considerations for 802.11 Devices)
- FCC KDB Publication 447498 D04v01 (General SAR Guidance, Wrist-worn Device Guidance)
- FCC KDB Publication 865664 D01v01r04, D02v01r02 (SAR Measurements up to 6 GHz)
- IEEE 1528-2013
- November 2017, October 2018, April 2019, November 2019, October 2020 TCBC Workshop Notes
- SPEAG DASY6 System Handbook
- SPEAG DASY6 Application Note (Interim Procedures for Devices Operating at 6-10 GHz) (Nov 2021)
- IEC 62479:2010
- IEC/IEEE 63195-1:2022

1.9 Device Serial Numbers

Several samples with identical hardware were used to support SAR testing. The manufacturer has confirmed that the device(s) tested have the same physical, mechanical, and thermal characteristics and are within operational tolerances expected for production units. The serial numbers used for each test are indicated alongside the results in Section 9.

1.10 Device Housing Types and Wrist Band Types

This device has one housing type that was evaluated independently for SAR: Aluminum. The device can also be used with different wristband accessories. The non-metallic wrist accessory, sport band, was evaluated for all exposure conditions. The available metallic wrist accessories, metal links band and metal loop band, were additionally evaluated.

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2 INTRODUCTION

The FCC and Innovation, Science, and Economic Development Canada have adopted the guidelines for evaluating the environmental effects of radio frequency (RF) radiation in ET Docket 93-62 on Aug. 6, 1996, and Health Canada Safety Code 6 to protect the public and workers from the potential hazards of RF emissions due to FCC-regulated portable devices. [1]

The safety limits used for the environmental evaluation measurements are based on the criteria published by the American National Standards Institute (ANSI) for localized specific absorption rate (SAR) in IEEE/ANSI C95.1-1992 Standard for Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 kHz to 300 GHz [3] and Health Canada RF Exposure Guidelines Safety Code 6 [22]. The measurement procedure described in IEEE/ANSI C95.3-2002 Recommended Practice for the Measurement of Potentially Hazardous Electromagnetic Fields - RF and Microwave [4] is used for guidance in measuring the Specific Absorption Rate (SAR) due to the RF radiation exposure from the Equipment Under Test (EUT). These criteria for SAR evaluation are similar to those recommended by the International Committee for Non-Ionizing Radiation Protection (ICNIRP) in Biological Effects and Exposure Criteria for Radiofrequency Electromagnetic Fields,” Report No. Vol 74. SAR is a measure of the rate of energy absorption due to exposure to an RF transmitting source. SAR values have been related to threshold levels for potential biological hazards.

2.1 SAR Definition

Specific Absorption Rate is defined as the time derivative (rate) of the incremental energy (dU) absorbed by (dissipated in) an incremental mass (dm) contained in a volume element (dV) of a given density (ρ). It is also defined as the rate of RF energy absorption per unit mass at a point in an absorbing body (see Equation 2-1).

Equation 2-1
SAR Mathematical Equation

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

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

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

where:

- σ = conductivity of the tissue-simulating material (S/m)
- ρ = mass density of the tissue-simulating material (kg/m³)
- E = Total RMS electric field strength (V/m)

NOTE: The primary factors that control rate of energy absorption were found to be the wavelength of the incident field in relation to the dimensions and geometry of the irradiated organism, the orientation of the organism in relation to the polarity of field vectors, the presence of reflecting surfaces, and whether conductive contact is made by the organism with a ground plane.[6]

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3 DOSIMETRIC ASSESSMENT

3.1 Measurement Procedure

The evaluation was performed using the following procedure compliant to FCC KDB Publication 865664 D01v01r04 and:

1. The SAR distribution at the exposed side of the head or body was measured at a distance no greater than 5.0 mm from the inner surface of the shell. The area covered the entire dimension of the device-head and body interface, and the horizontal grid resolution was determined per FCC KDB Publication 865664 D01v01r04 (See Table 3-1).
2. The point SAR measurement was taken at the maximum SAR region determined from Step 1 to enable the monitoring of SAR fluctuations/drifts during the 1g/10g cube evaluation. SAR at this fixed point was measured and used as a reference value.
3. Based on the area scan data, the peak of the region with maximum SAR was determined by spline interpolation. Around this point, a volume was assessed according to the measurement resolution and volume size requirements of FCC KDB Publication 865664 D01v01r04 (See Table 3-1). On the basis of this data set, the spatial peak SAR value was evaluated with the following procedure (see references or the DASY manual online for more details):
 - a. SAR values at the inner surface of the phantom are extrapolated from the measured values along the line away from the surface with spacing no greater than that in Table 3-1. The extrapolation was based on a least-squares algorithm. A polynomial of the fourth order was calculated through the points in the z-axis (normal to the phantom shell).
 - b. After the maximum interpolated values were calculated between the points in the cube, the SAR was averaged over the spatial volume (1g or 10g) using a 3D-Spline interpolation algorithm. The 3D-spline is composed of three one-dimensional splines with the “Not a knot” condition (in x, y, and z directions). The volume was then integrated with the trapezoidal algorithm. One thousand points (10 x 10 x 10) were obtained through interpolation, in order to calculate the averaged SAR.
 - c. All neighboring volumes were evaluated until no neighboring volume with a higher average value was found.
4. The SAR reference value, at the same location as step 2, was re-measured after the zoom scan was complete to calculate the SAR drift. If the drift deviated by more than 5%, the SAR test and drift measurements were repeated.

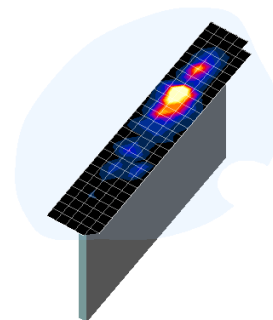


Figure 3-1
Sample SAR Area Scan

Table 3-1
Area and Zoom Scan Resolutions per FCC KDB Publication 865664 D01v01r04*

Frequency	Maximum Area Scan Resolution (mm) ($\Delta x_{\text{area}}, \Delta y_{\text{area}}$)	Maximum Zoom Scan Resolution (mm) ($\Delta x_{\text{zoom}}, \Delta y_{\text{zoom}}$)	Maximum Zoom Scan Spatial Resolution (mm)			Minimum Zoom Scan Volume (mm) (x,y,z)
			Uniform Grid $\Delta z_{\text{zoom}}(n)$	Graded Grid		
				$\Delta z_{\text{zoom}}(1)^*$	$\Delta z_{\text{zoom}}(n>1)^*$	
≤ 2 GHz	≤ 15	≤ 8	≤ 5	≤ 4	≤ 1.5* $\Delta z_{\text{zoom}}(n-1)$	≥ 30
2-3 GHz	≤ 12	≤ 5	≤ 5	≤ 4	≤ 1.5* $\Delta z_{\text{zoom}}(n-1)$	≥ 30
3-4 GHz	≤ 12	≤ 5	≤ 4	≤ 3	≤ 1.5* $\Delta z_{\text{zoom}}(n-1)$	≥ 28
4-5 GHz	≤ 10	≤ 4	≤ 3	≤ 2.5	≤ 1.5* $\Delta z_{\text{zoom}}(n-1)$	≥ 25
5-6 GHz	≤ 10	≤ 4	≤ 2	≤ 2	≤ 1.5* $\Delta z_{\text{zoom}}(n-1)$	≥ 22

*Also compliant to IEEE 1528-2013 Table 6

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4 TEST CONFIGURATION POSITIONS

4.1 Device Holder

The device holder is made out of low-loss POM material having the following dielectric parameters: relative permittivity $\epsilon = 3$ and loss tangent $\delta = 0.02$. Additionally, a manufacturer provided low-loss foam was used to position the device for head SAR evaluations.

4.2 Positioning for Head

Devices that are designed to be worn on the wrist may operate in speaker mode for voice communication, with the device worn on the wrist and positioned next to the mouth. When next-to-mouth SAR evaluation is required, the device is positioned at 10 mm from a flat phantom filled with head tissue-equivalent medium. The device is evaluated with wrist bands strapped together to represent normal use conditions.

4.3 Extremity Exposure Configurations

Devices that are designed or intended for use on extremities or mainly operated in extremity only exposure conditions: i.e., hands, wrists, feet, and ankles, may require extremity SAR evaluation. When the device also operates in close proximity to the user's body, SAR compliance for the body is also required. When extremity SAR evaluation is required, the device is evaluated with the back of the device touching the flat phantom, which is filled with head tissue-equivalent medium. The device was evaluated with Sport wristband unstrapped and touching the phantom. For Metal Loop and Metal Links wristbands, the device was evaluated with wristbands strapped and the distance between wristbands and the phantom was minimized to represent the spacing created by actual use conditions.

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5 RF EXPOSURE LIMITS

5.1 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.

5.2 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. This 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.

5.3 RF Exposure Limits for Frequencies Below 6 GHz

Table 5-1
SAR Human Exposure Specified in ANSI/IEEE C95.1-1992 and Health Canada Safety Code 6

HUMAN EXPOSURE LIMITS		
	UNCONTROLLED ENVIRONMENT <i>General Population</i> (W/kg) or (mW/g)	CONTROLLED ENVIRONMENT <i>Occupational</i> (W/kg) or (mW/g)
Peak Spatial Average SAR Head	1.6	8.0
Whole Body SAR	0.08	0.4
Peak Spatial Average SAR Hands, Feet, Ankle, Wrists, etc.	4.0	20

1. The Spatial Peak value of the SAR averaged over any 1 gram of tissue (defined as a tissue volume in the shape of a cube) and over the appropriate averaging time.
2. The Spatial Average value of the SAR averaged over the whole body.
3. The Spatial Peak value of the SAR averaged over any 10 grams of tissue (defined as a tissue volume in the shape of a cube) and over the appropriate averaging time.

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5.4 RF Exposure Limits for Frequencies Above 6 GHz

Per §1.1310 (d)(3), the MPE limits are applied for frequencies above 6 GHz. Power Density is expressed in units of W/m² or mW/cm².

Peak Spatially Averaged Power Density was evaluated over a circular area of 4 cm² per interim FCC Guidance for near-field power density evaluations per October 2018 TCB Workshop notes.

Table 6-2
Human Exposure Limits Specified in FCC 47 CFR §1.1310

Human Exposure to Radiofrequency (RF) Radiation Limits		
Frequency Range [MHz]	Power Density [mW/cm ²]	Average Time [Minutes]
(A) Limits For Occupational / Controlled Environments		
1,500 – 100,000	5.0	6
(B) Limits For General Population / Uncontrolled Environments		
1,500 – 100,000	1.0	30

Note: 1.0 mW/cm² is 10 W/m²

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6 FCC MEASUREMENT PROCEDURES

Power measurements for licensed transmitters are performed using a base station simulator under digital average power.

6.1 Measured and Reported SAR

Per FCC KDB Publication 447498 D04v01, when SAR is not measured at the maximum power level allowed for production units, the results must be scaled to the maximum tune-up tolerance limit according to the power applied to the individual channels tested to determine compliance. For simultaneous transmission, the measured aggregate SAR must be scaled according to the sum of the differences between the maximum tune-up tolerance and actual power used to test each transmitter. When SAR is measured at or scaled to the maximum tune-up tolerance limit, the results are referred to as *reported* SAR. The highest *reported* SAR results are identified on the grant of equipment authorization according to procedures in KDB 690783 D01v01r03.

6.2 SAR Testing with 802.11 Transmitters

The normal network operating configurations of 802.11 transmitters are not suitable for SAR measurements. Unpredictable fluctuations in network traffic and antenna diversity conditions can introduce undesirable variations in SAR results. The SAR for these devices should be measured using chipset-based test mode software to ensure the results are consistent and reliable. See KDB Publication 248227 D01v02r02 for more details.

6.2.1 General Device Setup

Chipset based test mode software is hardware dependent and generally varies among manufacturers. The device operating parameters established in test mode for SAR measurements must be identical to those programmed in production units, including output power levels, amplifier gain settings and other RF performance tuning parameters.

A periodic duty factor is required for current generation SAR systems to measure SAR. 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. The reported SAR is scaled to 100% transmission duty factor to determine compliance at the maximum tune-up tolerance limit.

6.2.2 U-NII-1 and U-NII-2A

For devices that operate in both U-NII-1 and U-NII-2A bands, when the same maximum output power is specified for both bands, SAR measurement using OFDM SAR test procedures is not required for U-NII-1 unless the highest reported SAR for U-NII-2A is > 1.2 W/kg. When different maximum output powers are specified for the bands, SAR measurement for the U-NII band with the lower maximum output power is not required unless the highest reported SAR for the U-NII band with the higher maximum output power, adjusted by the ratio of lower to higher specified maximum output power for the two bands, is > 1.2 W/kg. When 10g SAR measurement is considered, a factor of 2.5 is applied to the thresholds above.

6.2.3 U-NII-2C and U-NII-3

The frequency range covered by U-NII-2C and U-NII-3 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, the channels at 5.60 – 5.65 GHz in U-NII-2C band must be disabled with acceptable mechanisms and documented in the equipment certification. Unless band gap channels are permanently disabled, SAR must be considered for these channels. Each band is

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tested independently according to the normally required OFDM SAR measurement and probe calibration frequency points requirements.

6.2.4 2.4 GHz SAR Test Requirements

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:

- 1) 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.
- 2) 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.

2.4 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. When 10g SAR measurement is considered, a factor of 2.5 is applied to the thresholds above.

6.2.5 OFDM Transmission Mode and SAR Test Channel Selection

When the same maximum output power was specified for multiple OFDM transmission mode configurations in a frequency band or aggregated band, SAR is measured using the configuration with the largest channel bandwidth, lowest order modulation and lowest data rate. When the maximum output power of a channel is the same for equivalent OFDM configurations; for example, 802.11a, and 802.11n or 802.11g and 802.11n with the same channel bandwidth, modulation, and data rate etc., the lower order 802.11 mode i.e., 802.11a, then 802.11n or 802.11g then 802.11n, is used for SAR measurement. When the maximum output power are the same for multiple test channels, either according to the default or additional power measurement requirements, SAR is measured using the channel closest to the middle of the frequency band or aggregated band. When there are multiple channels with the same maximum output power, SAR is measured using the higher number channel.

6.2.6 Initial Test Configuration Procedure

For OFDM, an initial test configuration is determined for each frequency band and aggregated band, according to the transmission mode with the highest maximum output power specified for SAR measurements. When the same maximum output power is specified for multiple OFDM transmission mode configurations in a frequency band or aggregated band, SAR is measured using the configuration(s) with the largest channel bandwidth, lowest order modulation, lowest data rate and lowest order IEEE 802.11 mode. The channel of the transmission mode with the highest average RF output conducted power will be the initial test configuration.

When the reported SAR is ≤ 0.8 W/kg, no additional measurements on other test channels are required. Otherwise, SAR is evaluated using the subsequent highest average RF output channel until the reported SAR result is ≤ 1.2 W/kg or all channels are measured. When there are multiple untested channels having the same subsequent highest average RF output power, the channel with higher frequency from the lowest 802.11 mode is considered for SAR measurements (See Section 6.2.5). When 10g SAR measurement is considered, a factor of 2.5 is applied to the thresholds above.

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6.2.7 Subsequent Test Configuration Procedures

For OFDM configurations in each frequency band and aggregated band, SAR is evaluated for initial test configuration using the fixed test position or the initial test position procedure. When the highest reported SAR (for the initial test configuration), adjusted by the ratio of the specified maximum output power of the subsequent test configuration to initial test configuration, is ≤ 1.2 W/kg, no additional SAR tests for the subsequent test configurations are required. When 10g SAR measurement is considered, a factor of 2.5 is applied to the thresholds above.

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7 RF CONDUCTED POWERS

7.1 WLAN Conducted Powers

Table 7-1
2.4 GHz WLAN Maximum Average RF Power

2.4GHz WIFI (20MHz 802.11b SISO)		
Freq. [MHz]	Channel	Conducted Power [dBm]
2412	1	19.42
2437	6	19.36
2462	11	19.21

2.4GHz WIFI (20MHz 802.11g SISO)		
Freq. [MHz]	Channel	Conducted Power [dBm]
2412	1	16.44
2437	6	17.76
2462	11	15.13

2.4GHz WIFI (20MHz 802.11n SISO)		
Freq. [MHz]	Channel	Conducted Power [dBm]
2412	1	16.48
2437	6	17.38
2462	11	14.74

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Table 7-2
5 GHz WLAN Maximum Average RF Power

5GHz WIFI (20MHz 802.11a SISO)			
Band	Freq. [MHz]	Channel	Avg. Conducted Power [dBm]
UNII-1	5180	36	16.35
	5200	40	16.29
	5220	44	16.38
	5240	48	16.24
UNII-2A	5260	52	16.47
	5280	56	16.43
	5300	60	16.58
	5320	64	16.55
UNII-2C	5500	100	16.38
	5600	120	16.48
	5620	124	16.40
	5720	144	16.64
UNII-3	5745	149	16.65
	5785	157	16.61
	5825	165	16.64

5GHz WIFI (20MHz 802.11n SISO)			
Band	Freq. [MHz]	Channel	Avg. Conducted Power [dBm]
UNII-1	5180	36	16.24
	5200	40	16.30
	5220	44	16.36
	5240	48	16.55
UNII-2A	5260	52	16.43
	5280	56	16.37
	5300	60	16.40
	5320	64	16.24
UNII-2C	5500	100	16.29
	5600	120	16.22
	5620	124	16.22
	5720	144	16.36
UNII-3	5745	149	16.18
	5785	157	16.19
	5825	165	16.40

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Justification for test configurations for WLAN per KDB Publication 248227 D01v02r02:

- Power measurements were performed for the transmission mode configuration with the highest maximum output power specified for production units.
- For transmission modes with the same maximum output power specification, powers were measured for the largest channel bandwidth, lowest order modulation and lowest data rate.
- For transmission modes with identical maximum specified output power, channel bandwidth, modulation and data rates, power measurements were required for all identical configurations.
- For each transmission mode configuration, powers were measured for the highest and lowest channels; and at the mid-band channel(s) when there were at least 3 channels supported. For configurations with multiple mid-band channels, due to an even number of channels, both channels were measured.

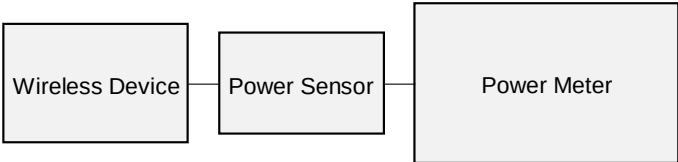


Figure 7-1
Power Measurement Setup

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7.2 Bluetooth Conducted Powers

Table 7-3
Bluetooth Maximum Average RF Power

Frequency [MHz]	Modulation	Data Rate [Mbps]	Channel No.	Avg Conducted Power	
				[dBm]	[mW]
2402	GFSK	1.0	0	17.90	61.660
2441	GFSK	1.0	39	17.94	62.230
2480	GFSK	1.0	78	17.87	61.235

Note 1: Bluetooth was evaluated with a test mode with 100% transmission duty factor.

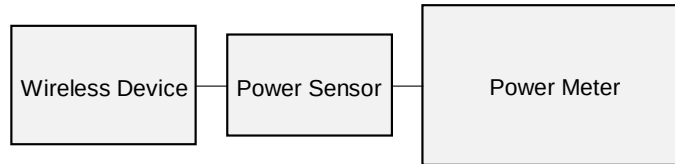


Figure 7-2
Power Measurement Setup

7.3 802.15.4 ab-NB Conducted Powers

Table 7-4
802.15.4 ab-NB Average RF Power

Frequency [MHz]	Modulation	Data Rate [Kbps]	Channel	Avg Conducted Power	
				[dBm]	[mW]
5728.75	O-QPSK	1000.0	Low	15.15	32.734
5786.25	O-QPSK	1000.0	Mid	15.04	31.915
5846.25	O-QPSK	1000.0	High	14.96	31.333

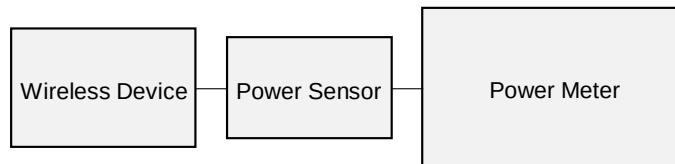


Figure 7-3
Power Measurement Setup

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7.4 802.15.4 ab-NB Duty Cycle

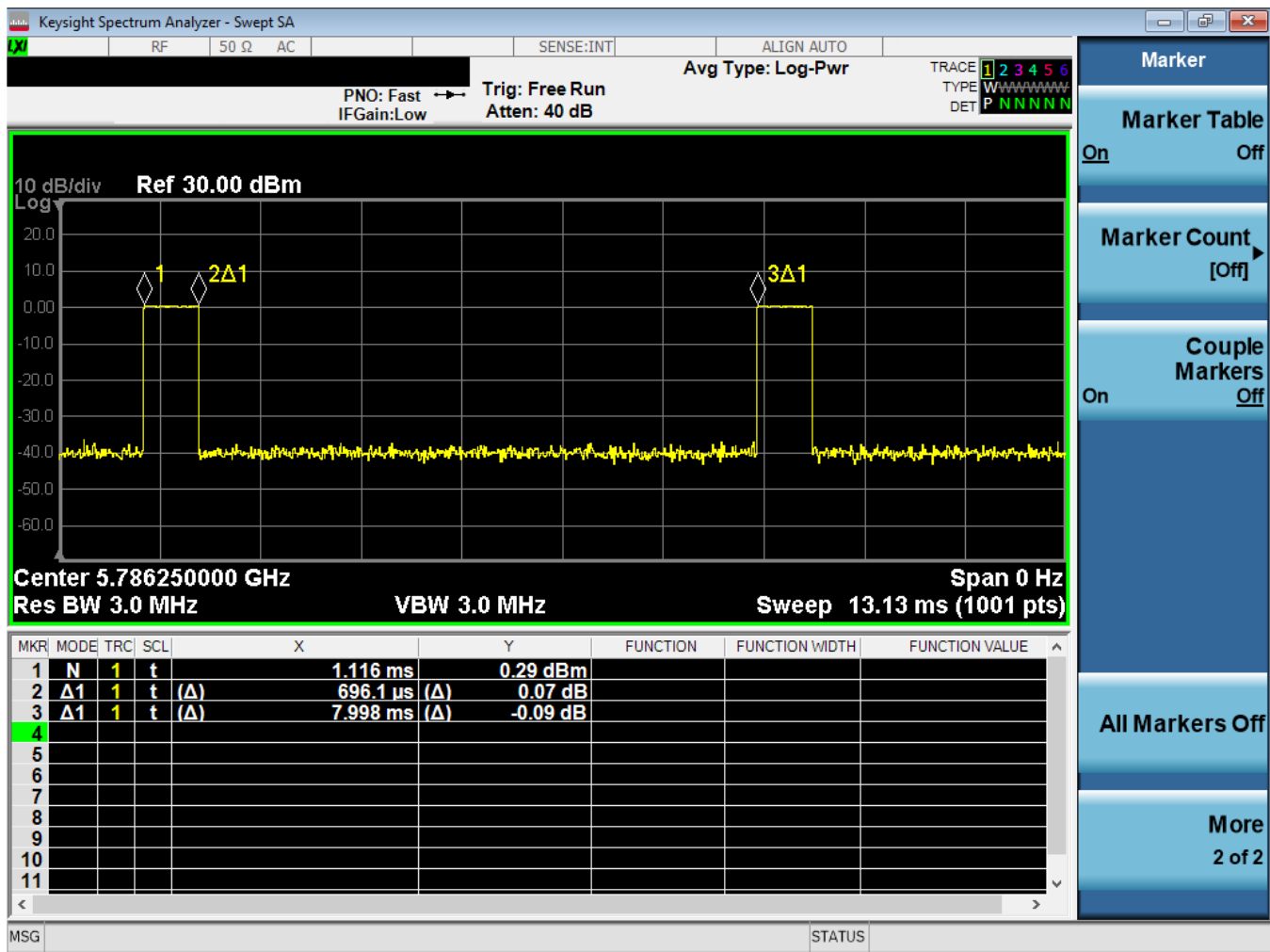


Figure 7-4
802.15.4 ab-NB Transmission Plot

Equation 7-1
802.15.4 ab-NB Duty Cycle Calculation

$$\text{Duty Cycle} = \frac{\text{Pulse Width}}{\text{Period}} * 100\% = \frac{0.6961}{7.998} * 100\% = 8.70\%$$

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8 SYSTEM VERIFICATION

8.1 Tissue Verification

Table 8-1
Measured Head Tissue Properties

Calibrated for Tests Performed on:	Tissue Type	Tissue Temp During Calibration (°C)	Measured Frequency (MHz)	Measured Conductivity, σ (S/m)	Measured Dielectric Constant, ϵ	TARGET Conductivity, σ (S/m)	TARGET Dielectric Constant, ϵ	% dev σ	% dev ϵ
07/09/2024	30 Head	24.0	12	0.723	52.434	0.750	55.000	-3.60%	-4.67%
			13	0.723	52.424	0.750	55.000	-3.60%	-4.68%
			14	0.723	52.364	0.750	55.000	-3.60%	-4.79%
07/08/2024	2450 Head	19.0	2300	1.638	40.049	1.670	39.500	-1.92%	1.39%
			2310	1.645	40.029	1.679	39.480	-2.03%	1.39%
			2320	1.653	40.010	1.687	39.460	-2.02%	1.39%
			2400	1.714	39.899	1.756	39.289	-2.39%	1.55%
			2450	1.755	39.819	1.800	39.200	-2.50%	1.58%
			2480	1.778	39.780	1.833	39.162	-3.00%	1.58%
			2500	1.793	39.745	1.855	39.136	-3.34%	1.56%
			2510	1.801	39.727	1.866	39.123	-3.48%	1.54%
			2535	1.822	39.688	1.893	39.092	-3.75%	1.52%
			2550	1.835	39.667	1.909	39.073	-3.88%	1.52%
			2560	1.843	39.653	1.920	39.060	-4.01%	1.52%
			2600	1.876	39.583	1.964	39.009	-4.48%	1.47%
			2650	1.921	39.505	2.018	38.945	-4.81%	1.44%
06/12/2024	5200-5800 Head	20.0	5180	4.546	34.831	4.635	36.009	-1.92%	-3.27%
			5190	4.554	34.808	4.645	35.998	-1.96%	-3.31%
			5200	4.562	34.780	4.655	35.986	-2.00%	-3.35%
			5210	4.569	34.756	4.666	35.975	-2.08%	-3.39%
			5220	4.580	34.736	4.676	35.963	-2.05%	-3.41%
			5240	4.599	34.693	4.696	35.940	-2.07%	-3.47%
			5250	4.605	34.673	4.706	35.929	-2.15%	-3.50%
			5260	4.617	34.662	4.717	35.917	-2.12%	-3.49%
			5270	4.633	34.652	4.727	35.906	-1.99%	-3.49%
			5280	4.648	34.629	4.737	35.894	-1.88%	-3.52%
			5290	4.652	34.628	4.748	35.883	-2.02%	-3.50%
			5300	4.657	34.620	4.758	35.871	-2.12%	-3.49%
			5310	4.668	34.602	4.768	35.860	-2.10%	-3.51%
			5320	4.680	34.575	4.778	35.849	-2.05%	-3.55%
			5500	4.881	34.307	4.963	35.643	-1.65%	-3.75%
			5510	4.890	34.291	4.973	35.632	-1.67%	-3.76%
			5520	4.900	34.271	4.983	35.620	-1.67%	-3.79%
			5530	4.909	34.245	4.994	35.609	-1.70%	-3.83%
			5540	4.917	34.237	5.004	35.597	-1.74%	-3.82%
			5550	4.926	34.227	5.014	35.586	-1.76%	-3.82%
			5560	4.936	34.199	5.024	35.574	-1.75%	-3.87%
			5580	4.968	34.124	5.045	35.551	-1.53%	-4.01%
			5600	4.996	34.114	5.065	35.529	-1.36%	-3.98%
			5610	5.007	34.111	5.076	35.518	-1.36%	-3.96%
			5620	5.014	34.108	5.086	35.506	-1.42%	-3.94%
			5640	5.025	34.086	5.106	35.483	-1.59%	-3.94%
			5660	5.046	34.012	5.127	35.460	-1.58%	-4.08%
			5670	5.068	33.970	5.137	35.449	-1.34%	-4.17%
			5680	5.087	33.946	5.147	35.437	-1.17%	-4.21%
			5690	5.100	33.938	5.158	35.426	-1.12%	-4.20%
			5745	5.138	33.895	5.214	35.363	-1.46%	-4.15%
			5750	5.146	33.877	5.219	35.357	-1.40%	-4.19%
			5755	5.153	33.856	5.224	35.351	-1.36%	-4.23%
			5765	5.170	33.819	5.234	35.340	-1.22%	-4.30%
			5775	5.186	33.793	5.245	35.329	-1.12%	-4.35%
			5785	5.199	33.778	5.255	35.317	-1.07%	-4.36%
			5800	5.217	33.794	5.270	35.300	-1.01%	-4.27%
			5835	5.239	33.770	5.305	35.230	-1.24%	-4.14%
			5845	5.247	33.735	5.315	35.210	-1.28%	-4.19%
			5850	5.253	33.714	5.320	35.200	-1.26%	-4.22%
			5855	5.260	33.688	5.325	35.197	-1.22%	-4.29%
			5865	5.279	33.649	5.336	35.190	-1.07%	-4.38%
			5875	5.288	33.624	5.347	35.183	-1.10%	-4.43%
			5885	5.294	33.623	5.357	35.177	-1.18%	-4.42%

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06/22/2024	5200-5800 Head	20.7	5180	4.534	34.774	4.635	36.009	-2.18%	-3.43%
			5190	4.544	34.758	4.645	35.998	-2.17%	-3.44%
			5200	4.556	34.755	4.655	35.986	-2.13%	-3.42%
			5210	4.564	34.743	4.666	35.975	-2.19%	-3.42%
			5220	4.575	34.721	4.676	35.963	-2.16%	-3.45%
			5240	4.600	34.684	4.696	35.940	-2.04%	-3.49%
			5250	4.610	34.681	4.706	35.929	-2.04%	-3.47%
			5260	4.620	34.659	4.717	35.917	-2.06%	-3.50%
			5270	4.633	34.639	4.727	35.906	-1.99%	-3.53%
			5280	4.641	34.612	4.737	35.894	-2.03%	-3.57%
			5290	4.642	34.606	4.748	35.883	-2.23%	-3.56%
			5300	4.650	34.591	4.758	35.871	-2.27%	-3.57%
			5310	4.663	34.580	4.768	35.860	-2.20%	-3.57%
			5320	4.680	34.565	4.778	35.849	-2.05%	-3.58%
			5500	4.863	34.250	4.963	35.643	-2.01%	-3.91%
			5510	4.871	34.232	4.973	35.632	-2.05%	-3.93%
			5520	4.883	34.209	4.983	35.620	-2.01%	-3.96%
			5530	4.895	34.182	4.994	35.609	-1.98%	-4.01%
			5540	4.905	34.175	5.004	35.597	-1.98%	-3.99%
			5550	4.914	34.171	5.014	35.586	-1.99%	-3.98%
			5560	4.922	34.157	5.024	35.574	-2.03%	-3.98%
			5580	4.952	34.107	5.045	35.551	-1.84%	-4.06%
			5600	4.977	34.075	5.065	35.529	-1.74%	-4.09%
			5610	4.989	34.060	5.076	35.518	-1.71%	-4.10%
			5620	5.000	34.049	5.086	35.506	-1.69%	-4.10%
			5640	5.018	34.036	5.106	35.483	-1.72%	-4.08%
			5660	5.042	34.012	5.127	35.460	-1.66%	-4.08%
			5670	5.060	33.990	5.137	35.449	-1.50%	-4.12%
			5680	5.077	33.963	5.147	35.437	-1.36%	-4.16%
			5690	5.090	33.949	5.158	35.426	-1.32%	-4.17%
			5700	5.098	33.934	5.168	35.414	-1.35%	-4.18%
			5710	5.105	33.919	5.178	35.403	-1.41%	-4.19%
			5720	5.115	33.900	5.188	35.391	-1.41%	-4.21%
			5745	5.138	33.883	5.214	35.363	-1.46%	-4.19%
			5750	5.144	33.871	5.219	35.357	-1.44%	-4.20%
			5755	5.150	33.859	5.224	35.351	-1.42%	-4.22%
			5765	5.164	33.828	5.234	35.340	-1.34%	-4.28%
			5775	5.176	33.803	5.245	35.329	-1.32%	-4.32%
			5785	5.187	33.786	5.255	35.317	-1.29%	-4.34%
			5795	5.194	33.777	5.265	35.305	-1.35%	-4.33%
			5800	5.201	33.773	5.270	35.300	-1.31%	-4.33%
			5805	5.204	33.763	5.275	35.294	-1.35%	-4.34%
			5825	5.215	33.733	5.296	35.271	-1.53%	-4.36%
			5835	5.227	33.720	5.305	35.230	-1.47%	-4.29%
			5845	5.243	33.705	5.315	35.210	-1.35%	-4.27%
			5850	5.250	33.700	5.320	35.200	-1.32%	-4.26%
			5855	5.258	33.691	5.325	35.197	-1.26%	-4.28%
			5865	5.267	33.662	5.336	35.190	-1.29%	-4.34%
			5875	5.276	33.639	5.347	35.183	-1.33%	-4.39%
			5885	5.286	33.618	5.357	35.177	-1.33%	-4.43%
			5905	5.298	33.578	5.379	35.163	-1.51%	-4.51%

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Calibrated for Tests Performed on:	Tissue Type	Tissue Temp During Calibration (°C)	Measured Frequency (MHz)	Measured Conductivity, σ (S/m)	Measured Dielectric Constant, ϵ	TARGET Conductivity, σ (S/m)	TARGET Dielectric Constant, ϵ	% dev σ	% dev ϵ
07/10/2024	5200-5800 Head	19.3	5180	4.543	34.779	4.635	36.009	-1.98%	-3.42%
			5190	4.554	34.765	4.645	35.998	-1.96%	-3.43%
			5200	4.563	34.743	4.655	35.986	-1.98%	-3.45%
			5210	4.574	34.721	4.666	35.975	-1.97%	-3.49%
			5220	4.587	34.705	4.676	35.963	-1.90%	-3.50%
			5240	4.607	34.678	4.696	35.940	-1.90%	-3.51%
			5250	4.618	34.665	4.706	35.929	-1.87%	-3.52%
			5260	4.630	34.647	4.717	35.917	-1.84%	-3.54%
			5270	4.641	34.622	4.727	35.906	-1.82%	-3.58%
			5280	4.650	34.600	4.737	35.894	-1.84%	-3.61%
			5290	4.659	34.582	4.748	35.883	-1.87%	-3.63%
			5300	4.670	34.566	4.758	35.871	-1.85%	-3.64%
			5310	4.683	34.541	4.768	35.860	-1.78%	-3.68%
			5320	4.696	34.512	4.778	35.849	-1.72%	-3.73%
			5500	4.891	34.216	4.963	35.643	-1.45%	-4.00%
			5510	4.900	34.196	4.973	35.632	-1.47%	-4.03%
			5520	4.912	34.172	4.983	35.620	-1.42%	-4.07%
			5530	4.926	34.146	4.994	35.609	-1.36%	-4.11%
			5540	4.939	34.123	5.004	35.597	-1.30%	-4.14%
			5550	4.951	34.106	5.014	35.586	-1.26%	-4.16%
			5560	4.963	34.102	5.024	35.574	-1.21%	-4.14%
			5580	4.986	34.072	5.045	35.551	-1.17%	-4.16%
			5600	5.010	34.029	5.065	35.529	-1.09%	-4.22%
			5610	5.019	34.010	5.076	35.518	-1.12%	-4.25%
			5620	5.030	33.988	5.086	35.506	-1.10%	-4.28%
			5640	5.053	33.933	5.106	35.483	-1.04%	-4.37%
			5660	5.079	33.894	5.127	35.460	-0.94%	-4.42%
			5670	5.093	33.886	5.137	35.449	-0.86%	-4.41%
			5680	5.103	33.876	5.147	35.437	-0.85%	-4.41%
			5690	5.112	33.862	5.158	35.426	-0.89%	-4.41%
			5700	5.125	33.846	5.168	35.414	-0.83%	-4.43%
			5710	5.137	33.825	5.178	35.403	-0.79%	-4.46%
			5720	5.148	33.802	5.188	35.391	-0.77%	-4.49%
			5745	5.177	33.741	5.214	35.363	-0.71%	-4.59%
			5750	5.182	33.731	5.219	35.357	-0.71%	-4.60%
			5755	5.186	33.721	5.224	35.351	-0.73%	-4.61%
			5765	5.197	33.702	5.234	35.340	-0.71%	-4.63%
			5775	5.209	33.691	5.245	35.329	-0.69%	-4.64%
			5785	5.223	33.683	5.255	35.317	-0.61%	-4.63%
			5795	5.235	33.674	5.265	35.305	-0.57%	-4.62%
			5800	5.240	33.665	5.270	35.300	-0.57%	-4.63%
			5805	5.245	33.657	5.275	35.294	-0.57%	-4.64%
			5825	5.267	33.615	5.296	35.271	-0.55%	-4.70%
			5835	5.282	33.595	5.305	35.230	-0.43%	-4.64%
			5845	5.292	33.578	5.315	35.210	-0.43%	-4.64%
			5850	5.296	33.568	5.320	35.200	-0.45%	-4.64%
			5855	5.300	33.554	5.325	35.197	-0.47%	-4.67%
			5865	5.308	33.528	5.336	35.190	-0.52%	-4.72%
			5875	5.317	33.502	5.347	35.183	-0.56%	-4.78%
			5885	5.329	33.481	5.357	35.177	-0.52%	-4.82%
			5905	5.359	33.461	5.379	35.163	-0.37%	-4.84%

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Calibrated for Tests Performed on:	Tissue Type	Tissue Temp During Calibration (°C)	Measured Frequency (MHz)	Measured Conductivity, σ (S/m)	Measured Dielectric Constant, ϵ	TARGET Conductivity, σ (S/m)	TARGET Dielectric Constant, ϵ	% dev σ	% dev ϵ
07/01/2024	6000 Head	19.0	5935	5.281	36.388	5.411	35.143	-2.40%	3.54%
			5970	5.334	36.326	5.448	35.120	-2.09%	3.43%
			5985	5.357	36.312	5.464	35.110	-1.96%	3.42%
			6000	5.377	36.300	5.480	35.100	-1.88%	3.42%
			6025	5.403	36.263	5.510	35.070	-1.94%	3.40%
			6065	5.457	36.155	5.557	35.022	-1.80%	3.24%
			6075	5.477	36.138	5.569	35.010	-1.65%	3.22%
			6085	5.496	36.127	5.580	34.998	-1.51%	3.23%
			6185	5.626	35.964	5.698	34.878	-1.26%	3.11%
			6275	5.740	35.771	5.805	34.770	-1.12%	2.88%
			6285	5.752	35.749	5.816	34.758	-1.10%	2.85%
			6305	5.776	35.702	5.840	34.734	-1.10%	2.79%
			6345	5.815	35.646	5.887	34.686	-1.22%	2.77%
			6475	5.970	35.438	6.041	34.530	-1.18%	2.63%
			6485	5.978	35.429	6.052	34.518	-1.22%	2.64%
			6500	5.986	35.404	6.070	34.500	-1.38%	2.62%
			6505	5.989	35.392	6.076	34.494	-1.43%	2.60%
			6545	6.044	35.280	6.122	34.446	-1.27%	2.42%
			6665	6.248	35.069	6.265	34.302	-0.27%	2.24%
			6675	6.261	35.057	6.273	34.290	-0.19%	2.24%
			6685	6.272	35.049	6.285	34.278	-0.21%	2.25%
			6715	6.299	35.008	6.319	34.242	-0.32%	2.24%
			6785	6.386	34.867	6.400	34.158	-0.22%	2.08%
			6825	6.395	34.801	6.447	34.110	-0.81%	2.03%
			6985	6.551	34.497	6.633	33.918	-1.24%	1.71%
			6995	6.562	34.479	6.644	33.906	-1.23%	1.69%
			7000	6.569	34.468	6.650	33.900	-1.22%	1.68%
			7005	6.576	34.455	6.656	33.894	-1.20%	1.66%
			7025	6.615	34.402	6.680	33.870	-0.97%	1.57%
			7500	7.223	33.534	7.240	33.300	-0.23%	0.70%
			7980	7.766	32.710	7.816	32.724	-0.64%	-0.04%
			8000	7.804	32.665	7.840	32.700	-0.46%	-0.11%

The above measured tissue parameters were used in the DASY software. The DASY software was used to perform interpolation to determine the dielectric parameters at the SAR test device frequencies (per KDB Publication 865664 D01v01r04 and IEEE 1528-2013 6.6.1.2). The tissue parameters listed in the SAR test plots may slightly differ from the table above due to significant digit rounding in the software. Per April 2019 TCB Workshop Notes, single head-tissue simulating liquid specified in IEC 62209-1 is permitted to use for all SAR tests.

Note: All frequencies were measured to be within 5% of targets listed in IEC/IEEE 62209-1528:2020 (Head). Per IEC/IEEE 62209-1528:2020, since the dielectric properties of the tissue simulating are all equal or less than 5% of the target values, SAR was not scaled. The measurement uncertainty of 5% for deviation of conductivity and liquid permittivity from the target was added to the uncertainty budget in Section 16.

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8.2 Test System Verification

Prior to SAR assessment, the system is verified to $\pm 10\%$ of the SAR measurement on the reference dipole at the time of calibration by the calibration facility. Full system validation status and result summary can be found in the SAR System Validation Appendix.

Table 8-2
System Verification Results – 1g

System Verification TARGET & MEASURED													
SAR System	Tissue Frequency (MHz)	Tissue Type	Date	Amb. Temp. (C)	Liquid Temp. (C)	Input Power (W)	Source SN	Probe SN	DAE	Measured SAR 1g (W/kg)	1W Target SAR 1g (W/kg)	1W Normalized SAR 1g (W/kg)	Deviation 1g (%)
AM13	2450	HEAD	07/08/2024	21.4	20.4	0.10	921	7682	1683	5.260	54.200	52.600	-2.95%
AM8	5250	HEAD	06/12/2024	20.6	21.0	0.05	1066	7427	467	3.770	80.300	75.400	-6.10%
AM1	5250	HEAD	07/10/2024	21.6	20.9	0.05	1123	3949	1684	3.960	79.400	79.200	-0.25%
AM8	5600	HEAD	06/12/2024	20.6	21.0	0.05	1066	7427	467	4.130	83.900	82.600	-1.55%
AM1	5600	HEAD	07/10/2024	21.6	20.9	0.05	1123	3949	1684	4.050	82.500	81.000	-1.82%
AM8	5750	HEAD	06/12/2024	20.6	21.0	0.05	1066	7427	467	4.070	79.500	81.400	2.39%
AM1	5750	HEAD	07/10/2024	21.6	20.9	0.05	1123	3949	1684	3.880	79.400	77.600	-2.27%
AM8	5850	HEAD	06/12/2024	20.6	21.0	0.05	1066	7427	467	4.070	82.200	81.400	-0.97%
AM1	5850	HEAD	07/10/2024	21.6	20.9	0.05	1123	3949	1684	3.970	80.100	79.400	-0.87%

Table 8-3
System Verification Results – 10g

System Verification TARGET & MEASURED															
SAR System	Tissue Frequency (MHz)	Tissue Type	Date	Amb. Temp. (C)	Liquid Temp. (C)	Input Power (W)	Source SN	Probe SN	DAE	Measured SAR 10g (W/kg)	1W Target SAR 10g (W/kg)	1W Normalized SAR 10g (W/kg)	Deviation 10g (%)	Measured 4cm ² APD (W/m ²)	1W Target 4cm ² APD (W/m ²)
AM14	13	HEAD	07/09/2024	22.0	22.5	1.00	1004	3746	1237	0.368	0.356	0.368	3.37%		
AM13	2450	HEAD	07/08/2024	21.4	20.4	0.10	921	7682	1683	2.520	25.500	25.200	-1.18%		
AM8	5250	HEAD	06/22/2024	21.5	19.6	0.05	1066	7427	467	1.080	23.100	21.600	-6.49%		
AM8	5600	HEAD	06/22/2024	21.5	19.6	0.05	1066	7427	467	1.180	24.100	23.600	-2.07%		
AM8	5750	HEAD	06/22/2024	21.5	19.6	0.05	1066	7427	467	1.130	22.600	22.600	0.00%		
AM8	5850	HEAD	06/22/2024	21.5	19.6	0.05	1066	7427	467	1.170	23.400	23.400	0.00%		
AM7	6500	HEAD	07/01/2024	20.3	20.1	0.025	1019	7421	604	1.270	54.100	50.800	-6.10%	31.1	1320
AM7	8000	HEAD	07/01/2024	20.3	20.1	0.025	1006	7421	604	1.070	45.400	42.800	-5.73%	26.1	1110

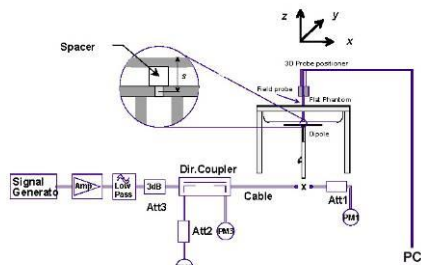


Figure 8-1
System Verification Setup Diagram



Figure 8-2
System Verification Setup Photo

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8.3 Power Density Test System Verification

The system was verified to be within ±0.66 dB of the power density targets on the calibration certificate according to the test system specification in the user’s manual and calibration facility recommendation. The 0.66 dB deviation threshold represents the expanded uncertainty for system performance checks using SPEAG’s mmWave verification sources. The same spatial resolution and measurement region used in the source calibration was applied during the system check.

The measured power density distribution of verification source was also confirmed through visual inspection to have no noticeable differences, both spatially (shape) and numerically (level) from the distribution provided by the manufacturer, per November 2017 TCBC Workshop Notes.

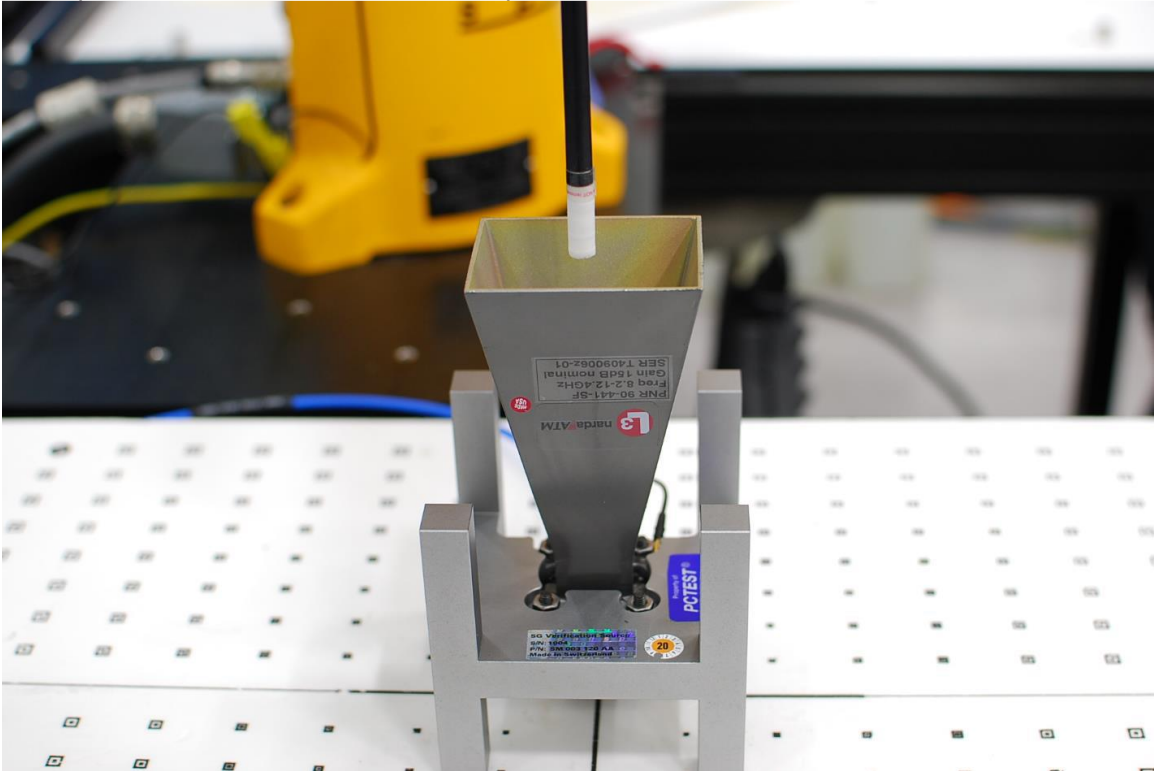


Figure 8-3
System Verification Setup Photo

Table 8-4
10 GHz Verification Results

System Verification												
System	Frequency (GHz)	Date	Source S/N	Probe S/N	DAE S/N	Prad (mW)	Normal psPD (W/m² over 4 cm²)		Deviation (dB)	Total psPD (W/m² over 4 cm²)		Deviation (dB)
							Measured	Target		Measured	Target	
AM5	10	07/01/2024	1006	9407	793	93.3	59.40	58.50	0.07	59.50	58.90	0.04

Note: A 10 mm distance spacing was used from the reference horn antenna aperture to the probe element.

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9 SAR DATA SUMMARY

9.1 2.4 GHz WIFI SISO Standalone Head SAR

Table 9-1

Exposure	Band / Mode	Bandwidth [MHz]	Service / Modulation	Housing Type	Wristband Type	Serial Number	Duty Cycle [%]	Power Drift [dB]	Frequency [MHz]	Channel #	Data Rate [Mbps]	Max Allowed Power [dBm]	Conducted Power [dBm]	Test Position	Spacing [mm]	Measured 1g SAR [W/kg]	Power Scaling Factor	Duty Cycle Scaling Factor	Reported 1g SAR [W/kg]	Plot #
Head	2.4 GHz WiFi / IEEE 802.11b	22	DSSS	Aluminum	Sport	FVOTK	99.76	-0.09	2412	1	1	20.00	19.42	Front	10	0.420	1.143	1.002	0.481	A1
Head	2.4 GHz WiFi / IEEE 802.11b	22	DSSS	Aluminum	Sport	FVOTK	99.76	0.01	2437	6	1	20.00	19.36	Front	10	0.483	1.159	1.002	0.561	
Head	2.4 GHz WiFi / IEEE 802.11b	22	DSSS	Aluminum	Sport	FVOTK	99.76	-0.03	2462	11	1	20.00	19.21	Front	10	0.432	1.199	1.002	0.519	
Head	2.4 GHz WiFi / IEEE 802.11b	22	DSSS	Aluminum	Metal Loop	FVOTK	99.76	-0.03	2412	1	1	20.00	19.42	Front	10	0.306	1.143	1.002	0.350	
Head	2.4 GHz WiFi / IEEE 802.11b	22	DSSS	Aluminum	Metal Links	FVOTK	99.76	0.01	2412	1	1	20.00	19.42	Front	10	0.292	1.143	1.002	0.334	
ANSI/IEEE C95.1 1992 - SAFETY LIMIT															Spatial Peak					
Uncontrolled Exposure/General Population															Head					
															1.6 W/kg (mW/g)					
															averaged over 1 gram					

9.2 5 GHz WIFI SISO Standalone Head SAR

Table 9-2

Exposure	Band / Mode	Bandwidth [MHz]	Service / Modulation	Housing Type	Wristband Type	Serial Number	Duty Cycle [%]	Power Drift [dB]	Frequency [MHz]	Channel #	U-NII band	Data Rate [Mbps]	Max Allowed Power [dBm]	Conducted Power [dBm]	Test Position	Spacing [mm]	Measured 1g SAR [W/kg]	Power Scaling Factor	Duty Cycle Scaling Factor	Reported 1g SAR [W/kg]	Plot #
Head	5 GHz WiFi / IEEE 802.11a	20	OFDM	Aluminum	Sport	T4N59	98.78	0.02	5300	60	U-NII-2A	6.5	17.00	16.58	Front	10	0.095	1.102	1.012	0.106	
Head	5 GHz WiFi / IEEE 802.11a	20	OFDM	Aluminum	Metal Loop	T4N59	98.78	0.06	5300	60	U-NII-2A	6.5	17.00	16.58	Front	10	0.099	1.102	1.012	0.110	
Head	5 GHz WiFi / IEEE 802.11a	20	OFDM	Aluminum	Metal Links	T4N59	98.78	0.04	5300	60	U-NII-2A	6.5	17.00	16.58	Front	10	0.098	1.102	1.012	0.109	
Head	5 GHz WiFi / IEEE 802.11a	20	OFDM	Aluminum	Sport	T4N59	98.78	0.04	5720	144	U-NII-2C	6.5	17.00	16.64	Front	10	0.157	1.086	1.012	0.173	
Head	5 GHz WiFi / IEEE 802.11a	20	OFDM	Aluminum	Metal Loop	T4N59	98.78	-0.08	5500	100	U-NII-2C	6.5	17.00	16.38	Front	10	0.133	1.153	1.012	0.155	
Head	5 GHz WiFi / IEEE 802.11a	20	OFDM	Aluminum	Metal Loop	T4N59	98.78	-0.01	5600	120	U-NII-2C	6.5	17.00	16.48	Front	10	0.153	1.127	1.012	0.175	
Head	5 GHz WiFi / IEEE 802.11a	20	OFDM	Aluminum	Metal Loop	T4N59	98.78	0.05	5620	124	U-NII-2C	6.5	17.00	16.40	Front	10	0.174	1.148	1.012	0.202	
Head	5 GHz WiFi / IEEE 802.11a	20	OFDM	Aluminum	Metal Loop	T4N59	98.78	-0.07	5720	144	U-NII-2C	6.5	17.00	16.64	Front	10	0.225	1.086	1.012	0.248	A2
Head	5 GHz WiFi / IEEE 802.11a	20	OFDM	Aluminum	Metal Links	T4N59	98.78	0.19	5720	144	U-NII-2C	6.5	17.00	16.64	Front	10	0.198	1.086	1.012	0.218	
Head	5 GHz WiFi / IEEE 802.11a	20	OFDM	Aluminum	Sport	T4N59	98.78	0.03	5745	149	U-NII-3	6.5	17.00	16.65	Front	10	0.169	1.084	1.012	0.185	
Head	5 GHz WiFi / IEEE 802.11a	20	OFDM	Aluminum	Metal Loop	T4N59	98.78	0.15	5745	149	U-NII-3	6.5	17.00	16.65	Front	10	0.145	1.084	1.012	0.159	
Head	5 GHz WiFi / IEEE 802.11a	20	OFDM	Aluminum	Metal Links	T4N59	98.78	0.05	5745	149	U-NII-3	6.5	17.00	16.65	Front	10	0.178	1.084	1.012	0.196	
ANSI/IEEE C95.1 1992 - SAFETY LIMIT															Spatial Peak						
Uncontrolled Exposure/General Population															Head						
															1.6 W/kg (mW/g)						
															averaged over 1 gram						

9.3 2.4 GHz Bluetooth SISO Standalone Head SAR

Table 9-3

Exposure	Band / Mode	Service / Modulation	Housing Type	Wristband Type	Serial Number	Duty Cycle [%]	Power Drift [dB]	Frequency [MHz]	Channel #	Data Rate [Mbps]	Max Allowed Power [dBm]	Conducted Power [dBm]	Test Position	Spacing [mm]	Measured 1g SAR [W/kg]	Power Scaling Factor	Duty Cycle Scaling Factor	Reported 1g SAR [W/kg]	Plot #
Head	2.4 GHz Bluetooth	FHSS	Aluminum	Sport	YYWC9	100.00	-0.01	2402	0	1	19.00	17.90	Front	10	0.318	1.288	1.000	0.410	A3
Head	2.4 GHz Bluetooth	FHSS	Aluminum	Sport	YYWC9	100.00	0.00	2441	39	1	19.00	17.94	Front	10	0.308	1.276	1.000	0.393	
Head	2.4 GHz Bluetooth	FHSS	Aluminum	Sport	YYWC9	100.00	-0.01	2480	78	1	19.00	17.87	Front	10	0.306	1.297	1.000	0.397	
Head	2.4 GHz Bluetooth	FHSS	Aluminum	Metal Loop	YYWC9	100.00	0.09	2441	39	1	19.00	17.94	Front	10	0.192	1.276	1.000	0.245	
Head	2.4 GHz Bluetooth	FHSS	Aluminum	Metal Links	YYWC9	100.00	0.00	2441	39	1	19.00	17.94	Front	10	0.176	1.276	1.000	0.225	
ANSI/IEEE C95.1 1992 - SAFETY LIMIT														Head					
Spatial Peak														1.6 W/kg (mW/g)					
Uncontrolled Exposure/General Population														averaged over 1 gram					

9.4 5 GHz 802.15.4 ab-NB SISO Standalone Head SAR

Table 9-4

Exposure	Band / Mode	Service / Modulation	Housing Type	Wristband Type	Serial Number	Duty Cycle [%]	Power Drift [dB]	Frequency [MHz]	Channel #	Data Rate [Mbps]	Max Allowed Power [dBm]	Conducted Power [dBm]	Test Position	Spacing [mm]	Measured 1g SAR [W/kg]	Power Scaling Factor	Duty Cycle Scaling Factor	Reported 1g SAR [W/kg]	Plot #
Head	802.15.4 ab-NB	O-QPSK	Aluminum	Sport	T4N59	8.70	0.06	5728.75	Low	1	16.00	15.15	Front	10	0.010	1.216	1.023	0.012	A4
Head	802.15.4 ab-NB	O-QPSK	Aluminum	Metal Loops	T4N59	8.70	0.01	5846.25	High	1	16.00	14.96	Front	10	0.015	1.271	1.023	0.020	
Head	802.15.4 ab-NB	O-QPSK	Aluminum	Metal Loops	T4N59	8.70	0.09	5728.75	Low	1	16.00	15.15	Front	10	0.011	1.216	1.023	0.014	
Head	802.15.4 ab-NB	O-QPSK	Aluminum	Metal Loops	T4N59	8.70	0.03	5786.25	Mid	1	16.00	15.04	Front	10	0.012	1.247	1.023	0.015	
Head	802.15.4 ab-NB	O-QPSK	Aluminum	Metal Links	T4N59	8.70	0.01	5728.75	Low	1	16.00	15.15	Front	10	0.009	1.216	1.023	0.011	
ANSI/IEEE C95.1 1992 - SAFETY LIMIT															Head				
Uncontrolled Exposure/General Population															Spatial Peak				
															1.6 W/kg (mW/g)				
															averaged over 1 gram				

Note: The reported SAR was scaled to the 8.9% transmission duty factor.

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9.5 2.4 GHz WIFI SISO Standalone Extremity SAR

Table 9-5

Exposure	Band / Mode	Bandwidth [MHz]	Service / Modulation	Housing Type	Wristband Type	Serial Number	Duty Cycle [%]	Power Drift [dB]	Frequency [MHz]	Channel #	Data Rate [Mbps]	Max Allowed Power [dBm]	Conducted Power [dBm]	Test Position	Spacing [mm]	Measured 10g SAR [W/kg]	Power Scaling Factor	Duty Cycle Scaling Factor	Reported 10g SAR [W/kg]	Plot #
Extremity	2.4 GHz WIFI / IEEE 802.11b	22	DSSS	Aluminum	Sport	T4N59	99.76	0.05	2412	1	1	20.00	19.42	Back	0	0.022	1.143	1.002	0.025	
Extremity	2.4 GHz WIFI / IEEE 802.11b	22	DSSS	Aluminum	Metal Loop	T4N59	99.76	0.04	2412	1	1	20.00	19.42	Back	0	0.019	1.143	1.002	0.022	
Extremity	2.4 GHz WIFI / IEEE 802.11b	22	DSSS	Aluminum	Metal Links	T4N59	99.76	0.02	2412	1	1	20.00	19.42	Back	0	0.035	1.143	1.002	0.040	A5
Extremity	2.4 GHz WIFI / IEEE 802.11b	22	DSSS	Aluminum	Metal Links	T4N59	99.76	-0.15	2417	6	1	20.00	19.36	Back	0	0.025	1.159	1.002	0.029	
Extremity	2.4 GHz WIFI / IEEE 802.11b	22	DSSS	Aluminum	Metal Links	T4N59	99.76	-0.05	2462	11	1	20.00	19.71	Back	0	0.024	1.199	1.002	0.029	
ANSI/IEEE C95.1 1992 - SAFETY LIMIT Spatial Peak Uncontrolled Exposure/General Population																Extremity 4.0 W/kg (mW/g) averaged over 10 grams				

9.6 5 GHz WIFI SISO Standalone Extremity SAR

Table 9-6

Exposure	Band / Mode	Bandwidth [MHz]	Service / Modulation	Housing Type	Wristband Type	Serial Number	Duty Cycle [%]	Power Drift [dB]	Frequency [MHz]	Channel #	U-NII band	Data Rate [Mbps]	Max Allowed Power [dBm]	Conducted Power [dBm]	Test Position	Spacing [mm]	Measured 10g SAR [W/kg]	Power Scaling Factor	Duty Cycle Scaling Factor	Reported 10g SAR [W/kg]	Plot #
Extremity	5 GHz WiFi / IEEE 802.11a	20	OFDM	Aluminum	Sport	3KW6L	98.78	0.07	5300	60	U-NII-2A	6.5	17.00	16.58	Back	0	0.004	1.102	1.012	0.004	
Extremity	5 GHz WiFi / IEEE 802.11a	20	OFDM	Aluminum	Metal Loop	3KW6L	98.78	0.02	5300	60	U-NII-2A	6.5	17.00	16.58	Back	0	0.009	1.102	1.012	0.010	
Extremity	5 GHz WiFi / IEEE 802.11a	20	OFDM	Aluminum	Metal Links	3KW6L	98.78	0.08	5300	60	U-NII-2A	6.5	17.00	16.58	Back	0	0.002	1.102	1.012	0.002	
Extremity	5 GHz WiFi / IEEE 802.11a	20	OFDM	Aluminum	Sport	3KW6L	98.78	0.03	5720	144	U-NII-2C	6.5	17.00	16.64	Back	0	0.013	1.086	1.012	0.014	
Extremity	5 GHz WiFi / IEEE 802.11a	20	OFDM	Aluminum	Metal Loop	3KW6L	98.78	0.08	5720	144	U-NII-2C	6.5	17.00	16.64	Back	0	0.016	1.086	1.012	0.018	
Extremity	5 GHz WiFi / IEEE 802.11a	20	OFDM	Aluminum	Metal Links	3KW6L	98.78	0.08	5720	144	U-NII-2C	6.5	17.00	16.64	Back	0	0.016	1.086	1.012	0.018	
Extremity	5 GHz WiFi / IEEE 802.11a	20	OFDM	Aluminum	Sport	3KW6L	98.78	0.05	5745	149	U-NII-3	6.5	17.00	16.65	Back	0	0.015	1.084	1.012	0.016	
Extremity	5 GHz WiFi / IEEE 802.11a	20	OFDM	Aluminum	Metal Loop	3KW6L	98.78	-0.06	5745	149	U-NII-3	6.5	17.00	16.65	Back	0	0.026	1.084	1.012	0.029	
Extremity	5 GHz WiFi / IEEE 802.11a	20	OFDM	Aluminum	Metal Loop	3KW6L	98.78	-0.20	5785	157	U-NII-3	6.5	17.00	16.61	Back	0	0.021	1.094	1.012	0.023	
Extremity	5 GHz WiFi / IEEE 802.11a	20	OFDM	Aluminum	Metal Loop	3KW6L	98.78	0.03	5825	165	U-NII-3	6.5	17.00	16.64	Back	0	0.027	1.086	1.012	0.030	A6
Extremity	5 GHz WiFi / IEEE 802.11a	20	OFDM	Aluminum	Metal Links	3KW6L	98.78	0.06	5745	149	U-NII-3	6.5	17.00	16.65	Back	0	0.016	1.084	1.012	0.018	
ANSI/IEEE C95.1 1992 - SAFETY LIMIT																Extremity					
Spatial Peak																4.0 W/kg (mW/g)					
Uncontrolled Exposure/General Population																averaged over 10 grams					

9.7 2.4 GHz Bluetooth SISO Standalone Extremity SAR

Table 9-7

Exposure	Band / Mode	Service / Modulation	Housing Type	Wristband Type	Serial Number	Duty Cycle [%]	Power Drift [dB]	Frequency [MHz]	Channel #	Data Rate [Mbps]	Max Allowed Power [dBm]	Conducted Power [dBm]	Test Position	Spacing [mm]	Measured 10g SAR [W/kg]	Power Scaling Factor	Duty Cycle Scaling Factor	Reported 10g SAR [W/kg]	Plot #
Extremity	2.4 GHz Bluetooth	FHSS	Aluminum	Sport	FVOTK	100.00	0.07	2441	39	1	19.00	17.94	Back	0	0.014	1.276	1.000	0.018	
Extremity	2.4 GHz Bluetooth	FHSS	Aluminum	Metal Loop	FVOTK	100.00	0.04	2441	39	1	19.00	17.94	Back	0	0.013	1.276	1.000	0.017	
Extremity	2.4 GHz Bluetooth	FHSS	Aluminum	Metal Links	FVOTK	100.00	0.03	2402	0	1	19.00	17.90	Back	0	0.020	1.288	1.000	0.026	A7
Extremity	2.4 GHz Bluetooth	FHSS	Aluminum	Metal Links	FVOTK	100.00	0.04	2441	39	1	19.00	17.94	Back	0	0.016	1.276	1.000	0.020	
Extremity	2.4 GHz Bluetooth	FHSS	Aluminum	Metal Links	FVOTK	100.00	0.21	2480	78	1	19.00	17.87	Back	0	0.017	1.297	1.000	0.022	
ANSI/IEEE C95.1 1992 - SAFETY LIMIT Spatial Peak Uncontrolled Exposure/General Population														Extremity 4.0 W/kg (mW/g) averaged over 10 grams					

9.8 5 GHz 802.15.4 ab-NB SISO Standalone Extremity SAR

Table 9-8

Exposure	Band / Mode	Service / Modulation	Housing Type	Wristband Type	Serial Number	Duty Cycle [%]	Power Drift [dB]	Frequency [MHz]	Channel #	Data Rate [Mbps]	Max Allowed Power [dBm]	Conducted Power [dBm]	Test Position	Spacing [mm]	Measured 10g SAR [W/kg]	Power Scaling Factor	Duty Cycle Scaling Factor	Reported 10g SAR [W/kg]	Plot #
Extremity	802.15.4 ab-NB	O-QPSK	Aluminum	Sport	T4N59	8.70	0.01	5728.75	Low	1	16.00	15.15	Back	0	0.000	1.216	1.023	0.000	
Extremity	802.15.4 ab-NB	O-QPSK	Aluminum	Metal Loops	T4N59	8.70	0.07	5846.25	High	1	16.00	14.96	Back	0	0.000	1.271	1.023	0.000	
Extremity	802.15.4 ab-NB	O-QPSK	Aluminum	Metal Loops	T4N59	8.70	0.05	5728.75	Low	1	16.00	15.15	Back	0	0.000	1.216	1.023	0.000	A8
Extremity	802.15.4 ab-NB	O-QPSK	Aluminum	Metal Loops	T4N59	8.70	0.04	5786.25	Mid	1	16.00	15.04	Back	0	0.000	1.247	1.023	0.000	
Extremity	802.15.4 ab-NB	O-QPSK	Aluminum	Metal Links	T4N59	8.70	0.08	5728.75	Low	1	16.00	15.15	Back	0	0.000	1.216	1.023	0.000	
ANSI/IEEE C95.1 1992 - SAFETY LIMIT																Extremity			
Spatial Peak																4.0 W/kg (mW/g)			
Uncontrolled Exposure/General Population																averaged over 10 grams			

Note: The reported SAR was scaled to the 8.9% transmission duty factor.

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9.9 UWB Standalone Extremity SAR and Absorbed Power Density

Table 9-9

Exposure	Band / Mode	Service / Modulation	Housing Type	Wristband Type	Serial Number	Duty Cycle	Power Drift [dB]	Frequency [MHz]	Channel #	Test Position	Spacing [mm]	Measured 10g SAR [W/kg]	Plot #
Extremity	UWB	CW	Aluminum	Sport	03V9M	1:1	0.01	6489.60	5	Back	0	0.002	
Extremity	UWB	CW	Aluminum	Sport	03V9M	1:1	0.01	7987.20	9	Back	0	0.000	
Extremity	UWB	CW	Aluminum	Metal Loop	03V9M	1:1	0.08	6489.60	5	Back	0	0.001	
Extremity	UWB	CW	Aluminum	Metal Loop	03V9M	1:1	0.03	7987.20	9	Back	0	0.003	A9
Extremity	UWB	CW	Aluminum	Metal Links	03V9M	1:1	0.06	6489.60	5	Back	0	0.002	
Extremity	UWB	CW	Aluminum	Metal Links	03V9M	1:1	0.01	7987.20	9	Back	0	0.001	
ANSI/IEEE C95.1 1992 - SAFETY LIMIT Spatial Peak Uncontrolled Exposure/General Population										Extremity 4.0 W/kg (mW/g) averaged over 10 grams			
Exposure	Band / Mode	Service / Modulation	Housing Type	Wristband Type	Serial Number	Duty Cycle	Power Drift [dB]	Frequency [MHz]	Channel #	Test Position	Spacing [mm]	Measured APD [W/m² (4cm²)]	Plot #
Extremity	UWB	CW	Aluminum	Sport	03V9M	1:1	0.01	6489.60	5	Back	0	0.043	
Extremity	UWB	CW	Aluminum	Sport	03V9M	1:1	0.01	7987.20	9	Back	0	0.025	
Extremity	UWB	CW	Aluminum	Metal Loop	03V9M	1:1	0.08	6489.60	5	Back	0	0.029	
Extremity	UWB	CW	Aluminum	Metal Loop	03V9M	1:1	0.03	7987.20	9	Back	0	0.077	A9
Extremity	UWB	CW	Aluminum	Metal Links	03V9M	1:1	0.06	6489.60	5	Back	0	0.051	
Extremity	UWB	CW	Aluminum	Metal Links	03V9M	1:1	0.01	7987.20	9	Back	0	0.028	

9.10 NFC Standalone Extremity SAR

Table 9-10

Exposure	Band / Mode	Signal Type	Housing Type	Wristband Type	Serial Number	Power Drift [dB]	Frequency [MHz]	Test Position	Spacing [mm]	Measured 10g SAR [W/kg]	Plot #
Extremity	NFC	A	Aluminum	Sport	T4N59	0.02	13.56	Back	0	0.000	
Extremity	NFC	A	Aluminum	Metal Loop	T4N59	0.01	13.56	Back	0	0.000	
Extremity	NFC	A	Aluminum	Metal Links	T4N59	0.01	13.56	Back	0	0.000	A10
ANSI/IEEE C95.1 1992 - SAFETY LIMIT Spatial Peak Uncontrolled Exposure/General Population								Extremity 4.0 W/kg (mW/g) averaged over 10 grams			

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9.11 SAR Test Notes

General Notes:

1. The test data reported are the worst-case SAR values according to test procedures specified in FCC KDB Publication 447498 D04v01.
2. Batteries are fully charged at the beginning of the SAR measurements.
3. Liquid tissue depth was at least 15.0 cm for all frequencies.
4. The manufacturer has confirmed that the device(s) tested have the same physical, mechanical, and thermal characteristics and are within operational tolerances expected for production units.
5. SAR results were scaled to the maximum allowed power to demonstrate compliance per FCC KDB Publication 447498 D04v01.
6. Per FCC KDB Publication 865664 D01v01r04, variability SAR tests were not required since measured SAR results for all frequency bands were less than 0.8 W/kg and 2.0 W/kg for 10g SAR.
7. This device has one housing type: Aluminum. The non-metallic wrist accessory, sport band, was evaluated for all exposure conditions. The available metallic wrist accessories, metal links band and metal loop band, were additionally evaluated.
8. This device is a portable wrist-worn device and does not support any other use conditions. Therefore, the procedures in FCC KDB Publication 447498 D04v01 Section 6.2 have been applied for extremity and next to mouth (head) conditions.
9. Unless otherwise noted, when 10g SAR measurement is considered, a factor of 2.5 is applied to the thresholds below.

WLAN Notes:

1. Justification for test configurations for WLAN per KDB Publication 248227 D01v02r02 for 2.4 GHz WIFI single transmission chain operations, the highest measured maximum output power channel for DSSS was selected for SAR measurement. SAR for OFDM modes (2.4 GHz 802.11g/n) was not required due to the maximum allowed powers and the highest reported DSSS SAR. See Section 6.2.4 for more information.
2. Justification for test configurations for WLAN per KDB Publication 248227 D01v02r02 for 5 GHz WIFI single transmission chain operations, the initial test configuration was selected according to the transmission mode with the highest maximum allowed powers. Other transmission modes were not investigated since the highest reported SAR for initial test configuration adjusted by the ratio of maximum output powers is less than 1.2 W/kg for 1g evaluations. See Section 6.2.5 for more information.
3. When the maximum reported 1g averaged SAR is ≤ 0.8 W/kg, SAR testing on additional channels was not required. Otherwise, SAR for the next highest output power channel was required until the reported SAR result was ≤ 1.20 W/kg for 1g evaluations or all test channels were measured. When 10g SAR measurement is considered, a factor of 2.5 is applied to the thresholds above.
4. The device was 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. The reported SAR was scaled to the 100% transmission duty factor to determine compliance.

Bluetooth Notes

1. To determine compliance, Bluetooth SAR was measured with the maximum power condition. Bluetooth was evaluated with a test mode with 100% transmission duty factor.

802.15.4 ab-NB Notes

1. 802.15.4 ab-NB SAR was scaled to the 8.9% transmission duty factor to determine compliance since the duty factor of the device is limited to 8.9% per manufacturer. See Section 7.4 for the 802.15.4 ab-NB time domain plot and calculation for the duty factor of the device.

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9.12 Power Density Data

Table 9-11

Measurement Results																		
Frequency (MHz)	Channel	Mode	Service	Wristband Type	Power Drift (dB)	Spacing (mm)	Antenna Config.	Housing Type	DUT Serial Number	Side	Grid Step (A)	iPD (W/m²)	Scaling Factor for Measurement Uncertainty per IEC 62479	Normal psPD (W/m²)	Scaled Normal psPD (W/m²)	Total psPD (W/m²)	Scaled Total psPD (W/m²)	Plot #
6489.60	5	UWB	CW	Sport	0.04	2	FCM	Aluminum	60H3K	Back	0.25	2.480	1.554	0.363	0.564	0.384	0.597	A11
6489.60	5	UWB	CW	Sport	0.00	9.24	FCM	Aluminum	60H3K	Back	0.25	0.930	1.554	0.234	0.364	0.235	0.365	
7987.20	9	UWB	CW	Sport	0.04	2	FCM	Aluminum	60H3K	Back	0.25	0.324	1.554	0.069	0.107	0.073	0.113	
6489.60	5	UWB	CW	Metal Loop	-0.06	2	FCM	Aluminum	60H3K	Back	0.25	0.687	1.554	0.144	0.224	0.150	0.233	
7987.20	9	UWB	CW	Metal Loop	0.00	2	FCM	Aluminum	60H3K	Back	0.25	0.040	1.554	0.026	0.040	0.028	0.044	
6489.60	5	UWB	CW	Metal Links	-0.05	2	FCM	Aluminum	60H3K	Back	0.25	1.120	1.554	0.166	0.258	0.184	0.286	
7987.20	9	UWB	CW	Metal Links	0.00	2	FCM	Aluminum	60H3K	Back	0.25	0.260	1.554	0.099	0.154	0.106	0.165	
47 CFR §1.1310 - SAFETY LIMIT Spatial Average Uncontrolled Exposure / General Population									Power Density 10 W/m² averaged over 4 cm²									

9.13 Power Density Notes

1. The manufacturer has confirmed that the devices tested have the same physical, mechanical, and thermal characteristics and are within operational tolerances expected for production units.
2. Batteries are fully charged at the beginning of the measurements. The DUT was connected to a wall charger for some measurements due to the test duration. It was confirmed that the charger plugged into this DUT did not impact the near-field PD test results.
3. Power density was calculated by repeated E-field measurements on two measurement planes separated by $\lambda/4$.
4. The device was 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.
5. Per FCC guidance and equipment manufacturer guidance, power density results were scaled according to IEC 62479:2010 for the portion of the measurement uncertainty > 30%. Total expanded uncertainty of 2.68 dB (85.4%) was used to determine the psPD measurement scaling factor.
6. Per equipment manufacturer guidance, power density was measured at $d=2\text{mm}$ and $d=\lambda/5\text{mm}$ using the same grid size and grid step size for some frequencies and surfaces. The integrated Power Density (iPD) was calculated based on these measurements. Since iPD ratio between the two distances is $\geq -1\text{dB}$, the grid step was sufficient for determining compliance at $d=2\text{mm}$.
7. PD results were scaled to the maximum allowed power to demonstrate compliance per FCC KDB Publication 447498 D04v01.
8. PTP-PR algorithm was used during psPD measurement and calculations.

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10 FCC MULTI-TX AND ANTENNA SAR CONSIDERATIONS

10.1 Introduction

The following procedures adopted from FCC KDB Publication 447498 D04v01 are applicable to devices with built-in unlicensed transmitters such as 802.11 and Bluetooth devices which may simultaneously transmit together.

10.2 Simultaneous Transmission Procedures

This device contains transmitters that may operate simultaneously. Therefore, simultaneous transmission analysis is required. Per FCC KDB Publication 447498 and IEEE 1528-2013 Section 6.3.4.1.2, simultaneous transmission SAR test exclusion may be applied when the sum of the 1g SAR for all the simultaneous transmitting antennas in a specific a physical test configuration is ≤ 1.6 W/kg. The different test positions in an exposure condition may be considered collectively to determine SAR test exclusion according to the sum of 1g or 10g SAR.

Note: In cases where simultaneous transmission scenarios overlap with the same power level (for example, cellular band + 2.4 GHz WIFI and cellular band + 2.4 GHz WIFI + 802.15.4 ab-NB), the most conservative SAR summation scenario was evaluated.

10.3 Head SAR Simultaneous Transmission Analysis

For SAR summation, the highest reported SAR across all housing and wristband types was used as a conservative evaluation for simultaneous transmission analysis.

Table 10-1
Simultaneous Transmission Scenario with 2.4 GHz WLAN and 802.15.4 ab-NB (Head at 1.0 cm)

Exposure Condition	2.4 GHz WIFI SAR (W/kg)	802.15.4 ab-NB SAR (W/kg)	Σ SAR (W/kg)
	1	2	1+2
Head SAR	0.561	0.020	0.581

Table 10-2
Simultaneous Transmission Scenarios with 2.4 GHz Bluetooth and 5 GHz WLAN (Head at 1.0 cm)

Exposure Condition	2.4 GHz Bluetooth SAR (W/kg)	5 GHz WIFI SAR (W/kg)	Σ SAR (W/kg)
	1	2	1+2
Head SAR	0.410	0.258	0.668

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Table 10-3
Simultaneous Transmission Scenarios with 2.4 GHz Bluetooth and 802.15.4 ab-NB (Head at 1.0 cm)

Exposure Condition	2.4 GHz Bluetooth SAR (W/kg)	802.15.4 ab-NB SAR (W/kg)	Σ SAR (W/kg)
	1	2	1+2
Head SAR	0.410	0.020	0.430

10.4 Extremity SAR Simultaneous Transmission Analysis

For SAR summation, the highest reported SAR across all housing and wristband types was used as a conservative evaluation for simultaneous transmission analysis.

Table 10-4
Simultaneous Transmission Scenarios with 2.4 GHz WLAN, 802.15.4 ab-NB, and NFC (Extremity at 0.0 cm)

Exposure Condition	2.4 GHz WIFI SAR (W/kg)	802.15.4 ab-NB SAR (W/kg)	NFC SAR (W/kg)	Σ SAR (W/kg)
	1	2	3	1+2+3
Extremity SAR	0.040	0.000	0.000	0.040

Table 10-5
Simultaneous Transmission Scenarios with 2.4 GHz WLAN, UWB, and NFC (Extremity at 0.0 cm)

Exposure Condition	2.4 GHz WIFI SAR (W/kg)	UWB SAR (W/kg)	NFC SAR (W/kg)	Σ SAR (W/kg)
	1	2	3	1+2+3
Extremity SAR	0.040	0.003	0.000	0.043

Table 10-6
Simultaneous Transmission Scenarios with 2.4 GHz Bluetooth, 5 GHz WLAN, and NFC (Extremity at 0.0 cm)

Exposure Condition	2.4 GHz Bluetooth SAR (W/kg)	5 GHz WIFI SAR (W/kg)	NFC SAR (W/kg)	Σ SAR (W/kg)
	1	2	3	1+2+3
Extremity SAR	0.026	0.030	0.000	0.056

Table 10-7
Simultaneous Transmission Scenarios with 2.4 GHz Bluetooth, 802.15.4 ab-NB, and NFC (Extremity at 0.0 cm)

Exposure Condition	2.4 GHz Bluetooth SAR (W/kg)	802.15.4 ab-NB SAR (W/kg)	NFC SAR (W/kg)	Σ SAR (W/kg)
	1	2	3	1+2+3
Extremity SAR	0.026	0.000	0.000	0.026

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Table 10-8
Simultaneous Transmission Scenarios with 2.4 GHz Bluetooth, UWB, and NFC (Extremity at 0.0 cm)

Exposure Condition	2.4 GHz Bluetooth SAR (W/kg)	UWB SAR (W/kg)	NFC SAR (W/kg)	Σ SAR (W/kg)
	1	2	3	1+2+3
Extremity SAR	0.026	0.003	0.000	0.029

10.5 Simultaneous Transmission Conclusion

The above numerical summed SAR results for all the worst-case simultaneous transmission conditions were below the SAR limit. Therefore, the above analysis is sufficient to determine that simultaneous transmission cases will not exceed the SAR limit and therefore no measured volumetric simultaneous SAR summation is required per FCC KDB Publication 447498 D04v01.

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11 SAR MEASUREMENT VARIABILITY

11.1 Measurement Variability

Per FCC KDB Publication 865664 D01v01r04, SAR measurement variability was not assessed for each frequency band since all measured SAR values are < 0.8 W/kg for 1g SAR and < 2.0 W/kg for 10g SAR.

11.2 Measurement Uncertainty

The measured SAR was <1.5 W/kg for 1g and <3.75 W/kg for 10g for all frequency bands. Therefore, per KDB Publication 865664 D01v01r04, the extended measurement uncertainty analysis was not required.

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12 EQUIPMENT LIST

Note: CBT (Calibrated Before Testing). Prior to testing, the measurement paths containing a cable, amplifier, attenuator, coupler, or filter were connected to a calibrated source (i.e., a signal generator) to determine the losses of the measurement path. The power meter offset was then adjusted to compensate for the measurement system losses. This level offset is stored within the power meter before measurements are made. This calibration verification procedure applies to the system verification and output power measurements. The calibrated reading is then taken directly from the power meter after compensation of the losses for all final power measurements. Each equipment item was used solely within its respective calibration period.

Manufacturer	Model	Description	Cal Date	Cal Interval	Cal Due	Serial Number
Agilent	E4404B	Spectrum Analyzer	N/A	N/A	N/A	MY45113242
Agilent	E4438C	ESG Vector Signal Generator	11/14/2023	Annual	11/14/2024	MY45093852
Agilent	E4438C	ESG Vector Signal Generator	11/15/2023	Annual	11/15/2024	MY45092078
Agilent	N5182A	MXG Vector Signal Generator	10/12/2023	Annual	10/12/2024	MY47400015
Agilent	N5182A	MXG Vector Signal Generator	3/7/2024	Annual	3/7/2025	MY47420603
Agilent	8753ES	S-Parameter Vector Network Analyzer	1/10/2024	Annual	1/10/2025	MY40001472
Agilent	8753ES	S-Parameter Vector Network Analyzer	7/21/2023	Annual	7/21/2024	US39170118
Agilent	N4010A	Wireless Connectivity Test Set	N/A	N/A	N/A	GB46170464
Amplifier Research	1551G6	Amplifier	CBT	N/A	CBT	433973
Amplifier Research	1551G6	Amplifier	CBT	N/A	CBT	433974
Amplifier Research	150A100C	Amplifier	CBT	N/A	CBT	350132
Anritsu	MN8110B	I/O Adaptor	CBT	N/A	CBT	6261747881
Anritsu	MA24106A	USB Power Sensor	12/4/2023	Annual	12/4/2024	1520501
Anritsu	MA24106A	USB Power Sensor	4/15/2024	Annual	4/15/2025	1827528
Anritsu	MA2411B	Pulse Power Sensor	8/22/2023	Annual	8/22/2024	1726262
Anritsu	MA2411B	Pulse Power Sensor	11/8/2023	Annual	11/8/2024	1027293
Anritsu	MA24106A	USB Power Sensor	12/4/2023	Annual	12/4/2024	1520501
Anritsu	MA24106A	USB Power Sensor	4/15/2024	Annual	4/15/2025	1827528
Control Company	4052	Long Stem Thermometer	2/27/2024	Biennial	2/27/2026	240174346
Control Company	4052	Long Stem Thermometer	2/27/2024	Biennial	2/27/2026	240171096
Control Company	4052	Long Stem Thermometer	2/27/2024	Biennial	2/27/2026	240171059
Control Company	4040	Therm./ Clock/ Humidity Monitor	4/15/2024	Biennial	4/15/2026	240310280
Control Company	4040	Therm./ Clock/ Humidity Monitor	4/15/2024	Biennial	4/15/2026	240310282
Control Company	S66279	Therm./ Clock/ Humidity Monitor	2/16/2024	Biennial	2/16/2026	240140051
Mitutoyo	500-196-30	CD-6"ASX 6inch Digital Caliper	2/16/2022	Triennial	2/16/2025	A20238413
Keysight Technologies	N9020A	MXA Signal Analyzer	4/11/2024	Annual	4/11/2025	MY54500644
MCL	BW-N6W5+	6dB Attenuator	CBT	N/A	CBT	1139
Mini-Circuits	VLF-6000+	Low Pass Filter DC to 6000 MHz	CBT	N/A	CBT	N/A
Mini-Circuits	BW-N20W5+	DC to 18 GHz Precision Fixed 20 dB Attenuator	CBT	N/A	CBT	N/A
Mini-Circuits	NLP-1200+	Low Pass Filter DC to 1000 MHz	CBT	N/A	CBT	N/A
Mini-Circuits	NLP-2950+	Low Pass Filter DC to 2700 MHz	CBT	N/A	CBT	N/A
Mini-Circuits	BW-N20W5	Power Attenuator	CBT	N/A	CBT	1226
Mini-Circuits	ZUDC10-83-S+	Directional Coupler	CBT	N/A	CBT	2050
Narda	4772-3	Attenuator (3dB)	CBT	N/A	CBT	9406
Narda	BW-53W2	Attenuator (3dB)	CBT	N/A	CBT	120
Seekonk	NC-100	Torque Wrench	4/2/2024	Biennial	4/2/2026	1262
SPEAG	DAK-3.5	Dielectric Assessment Kit	11/13/2023	Annual	11/13/2024	1277
SPEAG	DAKS-3.5	Portable Dielectric Assessment Kit	8/14/2023	Annual	8/14/2024	1041
SPEAG	MAIA	Modulation and Audio Interference Analyzer	N/A	N/A	N/A	1237
SPEAG	MAIA	Modulation and Audio Interference Analyzer	N/A	N/A	N/A	1331
SPEAG	MAIA	Modulation and Audio Interference Analyzer	N/A	N/A	N/A	1390
SPEAG	DAK-12	Dielectric Assessment Kit (4MHz - 3GHz)	3/11/2024	Annual	3/11/2025	1102
SPEAG	CLA-13	Confined Loop Antenna	11/9/2023	Annual	11/9/2024	1004
SPEAG	D2450V2	2450 MHz SAR Dipole	11/9/2021	Triennial	11/9/2024	921
SPEAG	D5GHzv2	5 GHz SAR Dipole	11/17/2022	Biennial	11/17/2024	1066
SPEAG	D5GHzv2	5 GHz SAR Dipole	3/12/2024	Annual	3/12/2025	1123
SPEAG	D6.5GHzv2	6.5 GHz SAR Dipole	10/11/2023	Annual	10/11/2024	1019
SPEAG	D8GHzv2	8 GHz SAR Dipole	5/8/2024	Annual	5/8/2025	1006
SPEAG	5G Ver. Source 10GHz	10GHz System Verification Antenna	10/13/2023	Annual	10/13/2024	1006
SPEAG	DAE4	Dasy Data Acquisition Electronics	10/18/2023	Annual	10/18/2024	1237
SPEAG	DAE4	Dasy Data Acquisition Electronics	10/18/2023	Annual	10/18/2024	793
SPEAG	DAE4	Dasy Data Acquisition Electronics	5/8/2024	Annual	5/8/2025	1683
SPEAG	DAE4	Dasy Data Acquisition Electronics	3/6/2024	Annual	3/6/2025	604
SPEAG	DAE4	Dasy Data Acquisition Electronics	2/9/2024	Annual	2/9/2025	467
SPEAG	DAE4	Dasy Data Acquisition Electronics	9/12/2023	Annual	9/12/2024	1684
SPEAG	EX3DV4	SAR Probe	5/13/2024	Annual	5/13/2025	7682
SPEAG	EX3DV4	SAR Probe	2/9/2024	Annual	2/9/2025	7427
SPEAG	EX3DV4	SAR Probe	10/16/2023	Annual	10/16/2024	3746
SPEAG	EX3DV4	SAR Probe	3/11/2024	Annual	3/11/2025	7421
SPEAG	EX3DV4	SAR Probe	10/2/2023	Annual	10/2/2024	3949
SPEAG	EUMmWV3	mmwave Probe	10/9/2023	Annual	10/9/2024	9407

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13 MEASUREMENT UNCERTAINTIES

Applicable for SAR measurements < 6 GHz:

a	b	c	d	e= f(d,k)	f	g	h = c x f/e	i = c x g/e	k
Uncertainty Component	IEEE 1528 Sec.	Tol. (± %)	Prob. Dist.	Div.	c _i 1gm	c _i 10 gms	1gm u _i (± %)	10gms u _i (± %)	v _i
Measurement System									
Probe Calibration	E2.1	7	N	1	1	1	7.0	7.0	∞
Axial Isotropy	E2.2	0.25	N	1	0.7	0.7	0.2	0.2	∞
Hemishperical Isotropy	E2.2	1.3	N	1	0.7	0.7	0.9	0.9	∞
Boundary Effect	E2.3	2	R	1.732	1	1	1.2	1.2	∞
Linearity	E2.4	0.3	N	1	1	1	0.3	0.3	∞
System Detection Limits	E2.4	0.25	R	1.732	1	1	0.1	0.1	∞
Modulation Response	E2.5	4.8	R	1.732	1	1	2.8	2.8	∞
Readout Electronics	E2.6	0.3	N	1	1	1	0.3	0.3	∞
Response Time	E2.7	0.8	R	1.732	1	1	0.5	0.5	∞
Integration Time	E2.8	2.6	R	1.732	1	1	1.5	1.5	∞
RF Ambient Conditions - Noise	E6.1	3	R	1.732	1	1	1.7	1.7	∞
RF Ambient Conditions - Reflections	E6.1	3	R	1.732	1	1	1.7	1.7	∞
Probe Positioner Mechanical Tolerance	E6.2	0.8	R	1.732	1	1	0.5	0.5	∞
Probe Positioning w/ respect to Phantom	E6.3	6.7	R	1.732	1	1	3.9	3.9	∞
Extrapolation, Interpolation & Integration algorithms for Max. SAR Evaluation	E5	4	R	1.732	1	1	2.3	2.3	∞
Test Sample Related									
Test Sample Positioning	E4.2	3.12	N	1	1	1	3.1	3.1	35
Device Holder Uncertainty	E4.1	1.67	N	1	1	1	1.7	1.7	5
Output Power Variation - SAR drift measurement	E2.9	5	R	1.732	1	1	2.9	2.9	∞
SAR Scaling	E6.5	0	R	1.732	1	1	0.0	0.0	∞
Phantom & Tissue Parameters									
Phantom Uncertainty (Shape & Thickness tolerances)	E3.1	7.6	R	1.73	1.0	1.0	4.4	4.4	∞
Liquid Conductivity - measurement uncertainty	E3.3	4.3	N	1	0.78	0.71	3.3	3.0	76
Liquid Permittivity - measurement uncertainty	E3.3	4.2	N	1	0.23	0.26	1.0	1.1	75
Liquid Conductivity - Temperature Uncertainty	E3.4	3.4	R	1.732	0.78	0.71	1.5	1.4	∞
Liquid Permittivity - Temperature Uncertainty	E3.4	0.6	R	1.732	0.23	0.26	0.1	0.1	∞
Liquid Conductivity - deviation from target values	E3.2	5.0	R	1.73	0.64	0.43	1.8	1.2	∞
Liquid Permittivity - deviation from target values	E3.2	5.0	R	1.73	0.60	0.49	1.7	1.4	∞
Combined Standard Uncertainty (k=1)							RSS	12.2	12.0
Expanded Uncertainty (95% CONFIDENCE LEVEL)							k=2	24.4	24.0

The above measurement uncertainties are according to IEEE Std. 1528-2013

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Applicable for SAR measurements > 6 GHz:

a	b	c	d	e= f(d,k)	f	g	h = c x f/e	i = c x g/e	k
Uncertainty Component	IEEE 1528 Sec.	Tol. (± %)	Prob. Dist.	Div.	c _i 1gm	c _i 10 gms	1gm u _i (± %)	10gms u _i (± %)	v _i
Measurement System									
Probe Calibration	E2.1	9.3	N	1	1	1	9.3	9.3	∞
Axial Isotropy	E2.2	0.25	N	1	0.7	0.7	0.2	0.2	∞
Hemishperical Isotropy	E2.2	1.3	N	1	0.7	0.7	0.9	0.9	∞
Boundary Effect	E2.3	2	R	1.732	1	1	1.2	1.2	∞
Linearity	E2.4	0.3	N	1	1	1	0.3	0.3	∞
System Detection Limits	E2.4	0.25	R	1.732	1	1	0.1	0.1	∞
Modulation Response	E2.5	4.8	R	1.732	1	1	2.8	2.8	∞
Readout Electronics	E2.6	0.3	N	1	1	1	0.3	0.3	∞
Response Time	E2.7	0.8	R	1.732	1	1	0.5	0.5	∞
Integration Time	E2.8	2.6	R	1.732	1	1	1.5	1.5	∞
RF Ambient Conditions - Noise	E6.1	3	R	1.732	1	1	1.7	1.7	∞
RF Ambient Conditions - Reflections	E6.1	3	R	1.732	1	1	1.7	1.7	∞
Probe Positioner Mechanical Tolerance	E6.2	0.8	R	1.732	1	1	0.5	0.5	∞
Probe Positioning w/ respect to Phantom	E6.3	6.7	R	1.732	1	1	3.9	3.9	∞
Extrapolation, Interpolation & Integration algorithms for Max. SAR Evaluation	E5	4	R	1.732	1	1	2.3	2.3	∞
Test Sample Related									
Test Sample Positioning	E4.2	3.12	N	1	1	1	3.1	3.1	35
Device Holder Uncertainty	E4.1	1.67	N	1	1	1	1.7	1.7	5
Output Power Variation - SAR drift measurement	E2.9	5	R	1.732	1	1	2.9	2.9	∞
SAR Scaling	E6.5	0	R	1.732	1	1	0.0	0.0	∞
Phantom & Tissue Parameters									
Phantom Uncertainty (Shape & Thickness tolerances)	E3.1	7.6	R	1.73	1.0	1.0	4.4	4.4	∞
Liquid Conductivity - measurement uncertainty	E3.3	4.3	N	1	0.78	0.71	3.3	3.0	76
Liquid Permittivity - measurement uncertainty	E3.3	4.2	N	1	0.23	0.26	1.0	1.1	75
Liquid Conductivity - Temperature Uncertainty	E3.4	3.4	R	1.732	0.78	0.71	1.5	1.4	∞
Liquid Permittivity - Temperature Uncertainty	E3.4	0.6	R	1.732	0.23	0.26	0.1	0.1	∞
Liquid Conductivity - deviation from target values	E3.2	5.0	R	1.73	0.64	0.43	1.8	1.2	∞
Liquid Permittivity - deviation from target values	E3.2	5.0	R	1.73	0.60	0.49	1.7	1.4	∞
Combined Standard Uncertainty (k=1)							RSS	13.8	13.6
Expanded Uncertainty (95% CONFIDENCE LEVEL)							k=2	27.6	27.1

The above measurement uncertainties are according to IEEE Std. 1528-2013

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Applicable for Power Density measurements:

a	b	c	d	e	f = c x f/e	g
Uncertainty Component	Unc. (± dB)	Prob. Dist.	Div.	c _i	u _i (± dB)	v _i
Measurement System						
Calibration	0.49	N	1	1	0.49	∞
Probe Correction	0.00	R	1.73	1	0.00	∞
Frequency Response	0.20	R	1.73	1	0.12	∞
Sensor Cross Coupling	0.00	R	1.73	1	0.00	∞
Isotropy	0.50	R	1.73	1	0.29	∞
Linearity	0.20	R	1.73	1	0.12	∞
Probe Scattering	0.00	R	1.73	1	0.00	∞
Probe Positioning offset	0.30	R	1.73	1	0.17	∞
Probe Positioning Repeatability	0.04	R	1.73	1	0.02	∞
Sensor Mechanical Offset	0.00	R	1.73	1	0.00	∞
Probe Spatial Resolution	0.00	R	1.73	1	0.00	∞
Field Impedance Dependence	0.00	R	1.73	1	0.00	∞
Amplitude and Phase Drift	0.00	R	1.73	1	0.00	∞
Amplitude and Phase Noise	0.04	R	1.73	1	0.02	∞
Measurement Area Truncation	0.00	R	1.73	1	0.00	∞
Data Acquisition	0.03	N	1	1	0.03	∞
Sampling	0.00	R	1.73	1	0.00	∞
Field Reconstruction	2.00	R	1.73	1	1.15	∞
Forward Transformation	0.00	R	1.73	1	0.00	∞
Power Density Scaling	0.00	R	1.73	1	0.00	∞
Spatial Averaging	0.10	R	1.73	1	0.06	∞
System Detection Limit	0.04	R	1.73	1	0.02	∞
Test Sample Related						
Probe Coupling with DUT	0.00	R	1.73	1	0.00	∞
Modulation Response	0.40	R	1.73	1	0.23	∞
Integration Time	0.00	R	1.73	1	0.00	∞
Response Time	0.00	R	1.73	1	0.00	∞
Device Holder Influence	0.10	R	1.73	1	0.06	∞
DUT alignment	0.00	R	1.73	1	0.00	∞
RF Ambient Conditions	0.04	R	1.73	1	0.02	∞
Ambient Reflections	0.04	R	1.73	1	0.02	∞
Immunity/Secondary Reception	0.00	R	1.73	1	0.00	∞
Drift of DUT	0.21	R	1.73	1	0.12	∞
Combined Standard Uncertainty (k=1)					RSS	1.34
Expanded Uncertainty (95% CONFIDENCE LEVEL)					k=2	2.68

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14 CONCLUSION

14.1 Measurement Conclusion

The SAR evaluation indicates that the EUT complies with the RF radiation exposure limits of the FCC and Innovation, Science, and Economic Development Canada, with respect to all parameters subject to this test. These measurements were taken to simulate the RF effects of RF exposure under worst-case conditions. Precise laboratory measures were taken to assure repeatability of the tests. The results and statements relate only to the item(s) tested.

Please note that the absorption and distribution of electromagnetic energy in the body are very complex phenomena that depend on the mass, shape, and size of the body, the orientation of the body with respect to the field vectors, and the electrical properties of both the body and the environment. Other variables that may play a substantial role in possible biological effects are those that characterize the environment (e.g., ambient temperature, air velocity, relative humidity, and body insulation) and those that characterize the individual (e.g., age, gender, activity level, debilitation, or disease). Because various factors may interact with one another to vary the specific biological outcome of an exposure to electromagnetic fields, any protection guide should consider maximal amplification of biological effects as a result of field-body interactions, environmental conditions, and physiological variables. [3]

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15 REFERENCES

- [1] Federal Communications Commission, ET Docket 93-62, Guidelines for Evaluating the Environmental Effects of Radiofrequency Radiation, Aug. 1996.
- [2] ANSI/IEEE C95.1-2005, American National Standard safety levels with respect to human exposure to radio frequency electromagnetic fields, 3kHz to 300GHz, New York: IEEE, 2006.
- [3] ANSI/IEEE C95.1-1992, American National Standard safety levels with respect to human exposure to radio frequency electromagnetic fields, 3kHz to 300GHz, New York: IEEE, Sept. 1992.
- [4] ANSI/IEEE C95.3-2002, IEEE Recommended Practice for the Measurement of Potentially Hazardous Electromagnetic Fields - RF and Microwave, New York: IEEE, December 2002.
- [5] IEEE Standards Coordinating Committee 39 –Standards Coordinating Committee 34 – 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.
- [6] NCRP, National Council on Radiation Protection and Measurements, Biological Effects and Exposure Criteria for RadioFrequency Electromagnetic Fields, NCRP Report No. 86, 1986. Reprinted Feb. 1995.
- [7] T. Schmid, O. Egger, N. Kuster, Automated E-field scanning system for dosimetric assessments, IEEE Transaction on Microwave Theory and Techniques, vol. 44, Jan. 1996, pp. 105-113.
- [8] K. Pokovic, T. Schmid, N. Kuster, Robust setup for precise calibration of E-field probes in tissue simulating liquids at mobile communications frequencies, ICECOM97, Oct. 1997, pp. 1 -124.
- [9] K. Pokovic, T. Schmid, and N. Kuster, E-field Probe with improved isotropy in brain simulating liquids, Proceedings of the ELMAR, Zadar, Croatia, June 23-25, 1996, pp. 172-175.
- [10] Schmid & Partner Engineering AG, Application Note: Data Storage and Evaluation, June 1998, p2.
- [11] V. Hombach, K. Meier, M. Burkhardt, E. Kuhn, N. Kuster, The Dependence of EM Energy Absorption upon Human Modeling at 900 MHz, IEEE Transaction on Microwave Theory and Techniques, vol. 44 no. 10, Oct. 1996, pp. 1865-1873.
- [12] N. Kuster and Q. Balzano, Energy absorption mechanism by biological bodies in the near field of dipole antennas above 300MHz, IEEE Transaction on Vehicular Technology, vol. 41, no. 1, Feb. 1992, pp. 17-23.
- [13] G. Hartsgrrove, A. Kraszewski, A. Surowiec, Simulated Biological Materials for Electromagnetic Radiation Absorption Studies, University of Ottawa, Bioelectromagnetics, Canada: 1987, pp. 29-36.
- [14] Q. Balzano, O. Garay, T. Manning Jr., Electromagnetic Energy Exposure of Simulated Users of Portable Cellular Telephones, IEEE Transactions on Vehicular Technology, vol. 44, no.3, Aug. 1995.
- [15] W. Gander, Computermathematick, Birkhaeuser, Basel, 1992.
- [16] W.H. Press, S.A. Teukolsky, W.T. Vetterling, and B.P. Flannery, Numerical Recipes in C, The Art of Scientific Computing, Second edition, Cambridge University Press, 1992.
- [17] N. Kuster, R. Kastle, T. Schmid, Dosimetric evaluation of mobile communications equipment with known precision, IEEE Transaction on Communications, vol. E80-B, no. 5, May 1997, pp. 645-652.

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- [18] CENELEC CLC/SC111B, European Prestandard (prENV 50166-2), Human Exposure to Electromagnetic Fields High-frequency: 10kHz-300GHz, Jan. 1995.
- [19] Prof. Dr. Niels Kuster, ETH, Eidgenössische Technische Hochschule Zürich, Dosimetric Evaluation of the Cellular Phone.
- [20] IEC 62209-1, Measurement procedure for the assessment of specific absorption rate of human exposure to radio frequency fields from hand-held and body-mounted wireless communication devices - Part 1: Devices used next to the ear (Frequency range of 300 MHz to 6 GHz), July 2016.
- [21] Innovation, Science, Economic Development Canada RSS-102 Radio Frequency Exposure Compliance of Radiocommunication Apparatus (All Frequency Bands) Issue 5, March 2015.
- [22] Health Canada Safety Code 6 Limits of Human Exposure to Radio Frequency Electromagnetic Fields in the Frequency Range from 3 kHz – 300 GHz, 2015
- [23] FCC SAR Test Procedures for 2G-3G Devices, Mobile Hotspot and UMPC Devices KDB Publications 941225, D01-D07
- [24] SAR Measurement Guidance for IEEE 802.11 Transmitters, KDB Publication 248227 D01
- [25] FCC SAR Considerations for Handsets with Multiple Transmitters and Antennas, KDB Publications 648474 D03-D04
- [26] FCC SAR Evaluation Considerations for Laptop, Notebook, Netbook and Tablet Computers, FCC KDB Publication 616217 D04
- [27] FCC SAR Measurement and Reporting Requirements for 100MHz – 6 GHz, KDB Publications 865664 D01-D02
- [28] FCC General RF Exposure Guidance and SAR Procedures for Dongles, KDB Publication 447498, D01-D02
- [29] Anexo à Resolução No. 533, de 10 de Setembro de 2009.
- [30] IEC 62209-2, Human exposure to radio frequency fields from hand-held and body-mounted wireless communication devices - Human models, instrumentation, and procedures - Part 2: Procedure to determine the specific absorption rate (SAR) for wireless communication devices used in close proximity to the human body (frequency range of 30 MHz to 6 GHz), Mar. 2010.

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