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SAR EVALUATION REPORT

Applicant Name:
Microsoft Corporation
One Microsoft Way
Redmond, WA 98052 USA

Date of Testing:
03/12/2024 – 04/01/2024
Test Site/Location:
Element Washington DC LLC,
Columbia, MD, USA
Document Serial No.:
1M2312190129-01.C3K

FCC ID: C3K2076

APPLICANT: MICOROSOFT CORPORATION

DUT Type: Portable Computing Device
Application Type: Certification
FCC Rule Part(s): CFR §2.1093
Model: 2076
Reference FCC ID: C3K2085

CCR2000

Equipment Class	Band & Mode	Tx Frequency	SAR		
			1g Laptop (W/kg)	1g Tablet (W/kg)	
DTS	2.4 GHz WIFI	2412 - 2472 MHz	<0.1	0.71	
NII	5 GHz WIFI	U-NII-1: 5180 - 5240 MHz U-NII-2A: 5260 - 5320 MHz U-NII-2C: 5500 - 5720 MHz U-NII-3: 5745 - 5825 MHz U-NII-4: 5845 - 5885 MHz	<0.1	0.67	
6CD	6 GHz WIFI	U-NII-5: 5935 - 6415 MHz U-NII-6: 6435 - 6515 MHz U-NII-7: 6535 - 6855 MHz U-NII-8: 6875 - 7115 MHz	<0.1	0.62	
DSS	2.4 GHz Bluetooth	2402 - 2480 MHz	<0.1	0.79	
Simultaneous SAR per KDB 690783 D01v01r03:			<0.1	1.59	
Equipment Class	Band & Mode	Tx Frequency	APD (W/m ²)		Reported PD (W/m ²)
			Laptop	Tablet	
6CD	6 GHz WIFI	U-NII-5: 5935 - 6415 MHz U-NII-6: 6435 - 6515 MHz U-NII-7: 6535 - 6875 MHz U-NII-8: 6895 - 7115 MHz	2.32	4.83	7.01

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.

Note: This table above includes test data from RF exposure technical report S/N: 1M2312190129-01.C3K per FCC TCB workshop for data referencing of closely related product APPENDIX D (FCC ID C3K2085)

This wireless portable device 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 1.8 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



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FCC ID: C3K2076	SAR EVALUATION REPORT	Approved by: Technical Manager
Document S/N: 1M2312190129-01.C3K	DUT Type: Portable Computing Device	Page 1 of 40

T A B L E O F C O N T E N T S

1	DEVICE UNDER TEST	3
2	INTRODUCTION	15
3	DOSIMETRIC ASSESSMENT	16
4	TEST CONFIGURATION POSITIONS.....	17
5	RF EXPOSURE LIMITS	18
6	FCC MEASUREMENT PROCEDURES.....	20
7	RF CONDUCTED POWERS.....	23
8	SYSTEM VERIFICATION.....	25
9	SAR DATA SUMMARY	30
10	FCC MULTI-TX AND ANTENNA SAR CONSIDERATIONS.....	33
11	EQUIPMENT LIST	34
12	MEASUREMENT UNCERTAINTIES.....	35
13	CONCLUSION.....	38
14	REFERENCES	39

APPENDIX A: SAR TISSUE SPECIFICATIONS

APPENDIX B: DUT ANTENNA DIAGRAM & SAR TEST SETUP PHOTOGRAPHS

APPENDIX C: PROBE AND DIPOLE CALIBRATION CERTIFICATES

APPENDIX D: FCC ID C3K2085 SAR TEST REPORTS PART 0, PART 1, PART 2

FCC ID: C3K2076	SAR EVALUATION REPORT	Approved by: Technical Manager
Document S/N: 1M2312190129-01.C3K	DUT Type: Portable Computing Device	Page 2 of 40

1 DEVICE UNDER TEST

1.1 Device Overview

Band & Mode	Operating Modes	Tx Frequency
2.4 GHz WIFI	Data	2412 - 2472 MHz
5 GHz WIFI	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
6 GHz WIFI	Data	U-NII-5: 5935 - 6415 MHz U-NII-6: 6435 - 6515 MHz U-NII-7: 6535 - 6855 MHz U-NII-8: 6875 - 7115 MHz
2.4 GHz Bluetooth	Data	2402 - 2480 MHz

1.2 Data Referencing

Reference Device		Variant Device	Key differences
FCC ID: C3K2085		FCC ID: C3K2076	Removed components for NFC (see KDB Inquiry 731334 exhibit for Data Referencing)
Equipment Class	Mode	Data Referencing	Comments
DTS	2.4 GHz WIFI	Y	See SAR Report Section 9.1 for spot-check data
NII	5 GHz WIFI	Y	See SAR Report Section 9.1 for spot-check data
6CD	6 GHz WIFI	Y	See SAR Report Section 9.1 for spot-check data
DSS	2.4 GHz BT	Y	See SAR Report Section 9.1 for spot-check data
DXX	NFC	N	Removed in variant device

Per manufacturer declaration, there are two tablet devices FCC ID: C3K2085 and FCC ID: C3K2076, with high degree of similarity, reference model FCC ID: C3K2085 and variant model FCC ID: C3K2076. Both models share the same material, form factor, circuit design, and components, including antennas and their locations. The reference and variant models use the same material, form factor, circuit design, and components, including antennas and their locations. The reference and variant models use the same power tables and have same tune-up tolerances.

Per FCC Approved Data Referencing Test Plan, testing was done fully on the reference model FCC ID: C3K2085, while spot-check verification has been performed on variant model FCC ID: C3K2076. The reference and variant model comparison data summary is included in section 9. Please see RF exposure technical reports in Appendix D: for complete compliance evaluation for the reference model.

FCC ID: C3K2076	SAR EVALUATION REPORT	Approved by: Technical Manager
Document S/N: 1M2312190129-01.C3K	DUT Type: Portable Computing Device	Page 3 of 40

1.3 Time-Averaging Algorithm for RF Exposure Compliance

This Device is enabled with the Qualcomm® FastConnect TAS feature for WLAN technologies. This feature performs time averaging algorithm in real time to control and manage transmitting power and ensure the time-averaged RF exposure is in compliance with FCC requirements all the time. Refer to Compliance Summary document for detailed description of Qualcomm® FastConnect TAS feature (report SN could be found in Section 1.11 – Bibliography).

Note that Bluetooth operations are not enabled with TAS.

The FastConnect TAS algorithm maintains the time-averaged transmit power, in turn, time-averaged RF exposure of SAR_design_target, below the predefined time-averaged power limit (i.e., P_{limit} for WLAN), for each characterized technology and band (see RF Exposure Part 0 Test Report, report SN can be found in Section 1.11 - Bibliography).

FastConnect TAS allows the device to transmit at higher power instantaneously, as high as P_{max} , when needed, but enforces power limiting to maintain time-averaged transmit power to P_{limit} . Below table shows Final P_{limit} settings and maximum tune up output power P_{max} configured for this EUT for various transmit conditions (Device State Index DSI for FastConnect.)

Exposure Scenario			Maximum Tune-Up Output Power*	Laptop or Tablet	Tablet
Averaging Volume				1g	1g
Spacing				0 mm, 25 mm	0 mm
DSI				0	1
Technology/Band	Antenna	Antenna Group	Pmax		
2.4 GHz WIFI	R	AG0	20.0	33.1	18.00
2.4 GHz WIFI	L	AG1	20.0	31.6	16.50
5 GHz WIFI	R	AG0	19.5	24.5	15.50
5 GHz WIFI	L	AG1	19.5	25.3	17.75
6 GHz WIFI	R	AG0	19.0	26.1	14.25
6 GHz WIFI	L	AG1	19.0	26.1	13.75

MIMO is not included in SAR CHAR due to the two antennas being in separate Antenna Groups.

*Maximum tune up output power P_{max} is used to configure EUT during RF tune up procedure. The maximum allowed output power is equal to maximum Tune up output power + 1dB device design uncertainty.

The maximum time-averaged output power (dBm) for any WLAN technology, band, and DSI = minimum of " P_{limit} EFS" and "Maximum tune up output power P_{max} " + 1dB device uncertainty. SAR values in this report were scaled to this maximum time-averaged output power to determine compliance per KDB Publication 447498 D01v06.

The purpose of this report (Part 1 test) is to demonstrate that the EUT meets FCC SAR limits when transmitting in static transmission scenario at maximum allowable time-averaged power levels.

Measurement Condition: All conducted power and SAR measurements in this report (Part 1 test) were performed by setting Reserve margin (FastConnect BDF entry) when applicable to 0dB.

FCC ID: C3K2076	SAR EVALUATION REPORT	Approved by: Technical Manager
Document S/N: 1M2312190129-01.C3K	DUT Type: Portable Computing Device	Page 4 of 40

FCC ID: C3K2076	SAR EVALUATION REPORT	Approved by: Technical Manager
Document S/N: 1M2312190129-01.C3K	DUT Type: Portable Computing Device	Page 5 of 40

1.5.2 5 GHz SISO/MIMO WLAN Output Power

The below table is applicable in the following conditions:

- Pmax, DSI=0 (No Motion and/or Laptop)

[illegible]

The below table is applicable in the following conditions:

- DSI=1 (Motion and Tablet)

Mode	Band	IEEE 802.11 Modulated Output Power (in dBm)																					
		SISO / SISO in MIMO										SISO / SISO in MIMO											
		Antenna R										Antenna L											
		a		n		ac		ax (SU)		be (SU)		a		n		ac		ax (SU)		be (SU)			
Maximum / Nominal Power	Max	Nom.	Max	Nom.	Max	Nom.	Max	Nom.	Max	Nom.	Max	Nom.	Max	Nom.	Max	Nom.	Max	Nom.	Max	Nom.			
5 GHz WiFi (20MHz BW)	UNII-1	16.50	15.50	16.50	15.50	16.50	15.50	16.50	15.50	16.50	15.50	18.75	17.75	18.75	17.75	18.75	17.75	18.75	17.75	18.75	17.75		
	UNII-2A	16.50	15.50	16.50	15.50	16.50	15.50	16.50	15.50	16.50	15.50	18.50	17.50	18.00	17.00	18.00	17.00	18.00	17.00	18.00	17.00		
		ch. 64: 15.00	14.00	ch. 64: 15.00	14.00	ch. 64: 15.00	14.00	ch. 64: 15.00	14.00	ch. 64: 15.00	14.00	ch. 64: 15.00	14.00	ch. 64: 15.00	14.00	ch. 64: 15.00	14.00	ch. 64: 15.00	14.00	ch. 64: 15.00	14.00		
	UNII-2C	15.75	14.75	15.75	14.75	15.75	14.75	15.75	14.75	15.75	14.75	18.00	17.00	17.50	16.50	17.50	16.50	17.50	16.50	17.50	16.50		
	UNII-3	15.50	14.50	15.50	14.50	15.50	14.50	15.50	14.50	15.50	14.50	17.50	16.50	17.50	16.50	17.50	16.50	17.50	16.50	17.50	16.50		
		ch. 149: 15.00	14.00	ch. 149: 15.00	14.00	ch. 149: 15.00	14.00	ch. 149: 15.00	14.00	ch. 149: 15.00	14.00	ch. 149: 15.00	14.00	ch. 149: 15.00	14.00	ch. 149: 15.00	14.00	ch. 149: 15.00	14.00	ch. 149: 15.00	14.00		
UNII-4	15.00	14.00	15.00	14.00	15.00	14.00	15.00	14.00	15.00	14.00	15.00	15.00	14.00	15.00	14.00	15.00	14.00	15.00	14.00	15.00	14.00		
5 GHz WiFi (40MHz BW)	UNII-1			15.00	14.00	15.00	14.00	15.00	14.00	15.00	14.00					15.00	14.00	15.00	14.00	15.00	14.00		
	UNII-2A			15.00	14.00	15.00	14.00	15.00	14.00	15.00	14.00					15.00	14.00	15.00	14.00	15.00	14.00		
	UNII-2C			15.00	14.00	15.00	14.00	15.00	14.00	15.00	14.00					15.00	14.00	15.00	14.00	15.00	14.00		
	UNII-3			15.50	14.50	15.50	14.50	15.50	14.50	15.50	14.50					17.50	16.50	17.50	16.50	17.50	16.50		
	UNII-4			15.50	14.50	15.50	14.50	15.50	14.50	15.50	14.50					17.50	16.50	17.50	16.50	17.50	16.50		
5 GHz WiFi (80MHz BW)	UNII-1					14.50	13.50	14.50	13.50	14.50	13.50							14.50	13.50	14.50	13.50	14.50	13.50
	UNII-2A					14.50	13.50	14.50	13.50	14.50	13.50							14.50	13.50	14.50	13.50	14.50	13.50
	UNII-2C					15.75	14.75	15.75	14.75	15.75	14.75							18.00	17.00	18.00	17.00	18.00	17.00
		ch. 106: 13.50 ch. 122: 13.50	12.50	ch. 106: 13.50 ch. 122: 13.50	12.50	ch. 106: 13.50 ch. 122: 13.50	12.50	ch. 106: 13.50 ch. 122: 13.50	12.50	ch. 106: 13.50 ch. 122: 13.50	12.50							ch. 106: 13.50 ch. 122: 13.50	12.50	ch. 106: 13.50 ch. 122: 13.50	12.50		
	UNII-3					13.50	12.50	13.50	12.50	13.50	12.50							13.50	12.50	13.50	12.50	13.50	12.50
	UNII-4					13.50	12.50	13.50	12.50	13.50	12.50							13.50	12.50	13.50	12.50	13.50	12.50
5 GHz WiFi (160MHz BW)	UNII-1/2A					14.50	13.50	14.50	13.50	14.50	13.50							14.50	13.50	14.50	13.50	14.50	13.50
	UNII-2C					13.50	12.50	13.50	12.50	13.50	12.50							13.50	12.50	13.50	12.50	13.50	12.50
	UNII-3/4					13.50	12.50	13.50	12.50	13.50	12.50							13.50	12.50	13.50	12.50	13.50	12.50

FCC ID: C3K2076	SAR EVALUATION REPORT	Approved by: Technical Manager
Document S/N: 1M2312190129-01.C3K	DUT Type: Portable Computing Device	Page 6 of 40

1.5.3 6 GHz SISO/MIMO WLAN SP Output Power

The below table is applicable in the following conditions:

- Pmax, DSI=0 (No Motion and/or Laptop)

Mode	Band	IEEE 802.11 Modulated Output Power (in dBm)											
		SISO / SISO In MIMO						SISO / SISO In MIMO					
		Antenna R						Antenna L					
		a		ax (SU)		be (SU)		a		ax (SU)		be (SU)	
Maximum / Nominal Power		Max	Nom.	Max	Nom.	Max	Nom.	Max	Nom.	Max	Nom.	Max	Nom.
6 GHz WIFI (20MHz BW) - SP	UNII-5	18.5	17.5	19.0	18.0	19.0	18.0	18.5	17.5	19.0	18.0	19.0	18.0
		ch. 2: 7.0	6.0	ch. 2: 7.0	6.0	ch. 2: 7.0	6.0	ch. 2: 7.0	6.0	ch. 2: 7.0	6.0	ch. 2: 7.0	6.0
	UNII-7	18.5	17.5	19.0	18.0	19.0	18.0	18.5	17.5	19.0	18.0	19.0	18.0
6 GHz WIFI (40MHz BW) - SP	UNII-5			20.0	19.0	20.0	19.0			20.0	19.0	20.0	19.0
				ch. 3: 18.0 ch. 91: 18.0	17.0 17.0	ch. 3: 18.0 ch. 91: 18.0	17.0 17.0			ch. 3: 18.0 ch. 91: 18.0	17.0 17.0	ch. 3: 18.0 ch. 91: 18.0	17.0 17.0
	UNII-7			20.0	19.0	20.0	19.0			20.0	19.0	20.0	19.0
				ch. 123: 18.0 ch. 179: 15.0	17.0 14.0	ch. 123: 18.0 ch. 179: 15.0	17.0 14.0			ch. 123: 18.0 ch. 179: 15.0	17.0 14.0	ch. 123: 18.0 ch. 179: 15.0	17.0 14.0
6 GHz WIFI (80MHz BW) - SP	UNII-5			18.0	17.0	18.0	17.0			18.0	17.0	18.0	17.0
	UNII-7			20.0	19.0	20.0	19.0			20.0	19.0	20.0	19.0
6 GHz WIFI (160MHz BW) - SP	UNII-5			18.0	17.0	18.0	17.0			18.0	17.0	18.0	17.0
	UNII-7			19.0	18.0	19.0	18.0			19.0	18.0	19.0	18.0
6 GHz WIFI (320MHz BW) - SP	UNII-5					18.0	17.0					18.0	17.0

The below table is applicable in the following conditions:

- DSI=1 (Motion and Tablet)

Mode	Band	IEEE 802.11 Modulated Output Power (in dBm)											
		SISO / SISO In MIMO						SISO / SISO In MIMO					
		Antenna R						Antenna L					
		a		ax (SU)		be (SU)		a		ax (SU)		be (SU)	
Maximum / Nominal Power		Max	Nom.	Max	Nom.	Max	Nom.	Max	Nom.	Max	Nom.	Max	Nom.
6 GHz WIFI (20MHz BW) - SP	UNII-5	14.25	13.25	14.25	13.25	14.25	13.25	14.00	13.00	14.00	13.00	14.00	13.00
		ch. 2: 7.00	6.00	ch. 2: 7.00	6.00	ch. 2: 7.00	6.00	ch. 2: 7.00	6.00	ch. 2: 7.00	6.00	ch. 2: 7.00	6.00
	UNII-7	15.25	14.25	15.25	14.25	15.25	14.25	14.75	13.75	14.75	13.75	14.75	13.75
6 GHz WIFI (40MHz BW) - SP	UNII-5			14.25	13.25	14.25	13.25			14.00	13.00	14.00	13.00
	UNII-7			15.25	14.25	15.25	14.25			14.75	13.75	14.75	13.75
				ch. 179: 15.00	14.00	ch. 179: 15.00	14.00						
6 GHz WIFI (80MHz BW) - SP	UNII-5			14.25	13.25	14.25	13.25			14.00	13.00	14.00	13.00
	UNII-7			15.25	14.25	15.25	14.25			14.75	13.75	14.75	13.75
6 GHz WIFI (160MHz BW) - SP	UNII-5			14.25	13.25	14.25	13.25			14.00	13.00	14.00	13.00
	UNII-7			15.25	14.25	15.25	14.25			14.75	13.75	14.75	13.75
6 GHz WIFI (320MHz BW) - SP	UNII-5					14.25	13.25					14.00	13.00

FCC ID: C3K2076	SAR EVALUATION REPORT		Approved by: Technical Manager
Document S/N: 1M2312190129-01.C3K	DUT Type: Portable Computing Device		Page 7 of 40

1.5.4 6 GHz SISO/MIMO WLAN LPI Output Power

The below table is applicable in the following conditions:

- Pmax, DSI=0 (No Motion and/or Laptop), DSI=1 (Motion and Tablet)

Mode	Band	IEEE 802.11 Modulated Output Power (in dBm)											
		SISO / SISO In MIMO						SISO / SISO In MIMO					
		Antenna R						Antenna L					
		a		ax (SU)		be (SU)		a		ax (SU)		be (SU)	
Maximum / Nominal Power		Max	Nom.	Max	Nom.	Max	Nom.	Max	Nom.	Max	Nom.	Max	Nom.
6 GHz WIFI (20MHz BW) - LPI	UNII-5	0.0	-1.0	0.5	-0.5	0.5	-0.5	0.0	-1.0	0.5	-0.5	0.5	-0.5
	UNII-6	0.0	-1.0	0.5	-0.5	0.5	-0.5	0.0	-1.0	0.5	-0.5	0.5	-0.5
	UNII-7	0.0	-1.0	0.5	-0.5	0.5	-0.5	0.0	-1.0	0.5	-0.5	0.5	-0.5
	UNII-8	0.0	-1.0	0.5	-0.5	0.5	-0.5	0.0	-1.0	0.5	-0.5	0.5	-0.5
6 GHz WIFI (40MHz BW) - LPI	UNII-5			4.0	3.0	4.0	3.0			4.0	3.0	4.0	3.0
	UNII-6			4.0	3.0	4.0	3.0			4.0	3.0	4.0	3.0
	UNII-7			4.0	3.0	4.0	3.0			4.0	3.0	4.0	3.0
	UNII-8			4.0	3.0	4.0	3.0			4.0	3.0	4.0	3.0
6 GHz WIFI (80MHz BW) - LPI	UNII-5			6.5	5.5	6.5	5.5			6.5	5.5	6.5	5.5
	UNII-6			6.5	5.5	6.5	5.5			6.5	5.5	6.5	5.5
	UNII-7			6.5	5.5	6.5	5.5			6.5	5.5	6.5	5.5
	UNII-8			6.5	5.5	6.5	5.5			6.5	5.5	6.5	5.5
6 GHz WIFI (160MHz BW) - LPI	UNII-5			8.5	7.5	8.5	7.5			8.5	7.5	8.5	7.5
	UNII-6			8.5	7.5	8.5	7.5			8.5	7.5	8.5	7.5
	UNII-7			8.5	7.5	8.5	7.5			8.5	7.5	8.5	7.5
	UNII-8			8.5	7.5	8.5	7.5			8.5	7.5	8.5	7.5
6 GHz WIFI (320MHz BW) - LPI	UNII-5					10.5	9.5					10.5	9.5
	UNII-6					10.5	9.5					10.5	9.5
	UNII-7					10.5	9.5					10.5	9.5
	UNII-8					10.5	9.5					10.5	9.5

FCC ID: C3K2076	SAR EVALUATION REPORT	Approved by: Technical Manager
Document S/N: 1M2312190129-01.C3K	DUT Type: Portable Computing Device	Page 8 of 40

1.5.5 2.4 GHz Maximum Bluetooth Output Power

Mode	Data Rate	Modulated Output Power (in dBm)					
		Single Antenna				Each Chain in Beam Forming Mode	
		Antenna R		Antenna L		Beam Forming	
Maximum / Nominal Power		Max	Nom.	Max	Nom.	Max	Nom.
Bluetooth	1Mbps	21.0	19.0	21.0	19.0	18.0	16.0
Bluetooth EDR	2Mbps	18.0	16.0	18.0	16.0	15.0	13.0
Bluetooth EDR	3Mbps	18.0	16.0	18.0	16.0	15.0	13.0
Bluetooth LE	1Mbps	21.0	19.0	21.0	19.0	18.0	16.0
Bluetooth LE	2Mbps	21.0	19.0	21.0	19.0	18.0	16.0
Bluetooth LE	125kbps	14.0	12.0	14.0	12.0	N/A	N/A
Bluetooth LE	500kbps	14.0	12.0	14.0	12.0	N/A	N/A

1.5.6 2.4 GHz Reduced Bluetooth Output Power

The below table is applicable in the following conditions:

- Tablet Mode with motion sensor active

Mode	Data Rate	Modulated Output Power (in dBm)					
		Single Antenna				Each Chain in Beam Forming Mode	
		Antenna R		Antenna L		Beam Forming	
Maximum / Nominal Power		Max	Nom.	Max	Nom.	Max	Nom.
Bluetooth	1Mbps	20.00	18.00	18.25	16.25	18.0	16.0
Bluetooth EDR	2Mbps	18.00	16.00	18.00	16.00	15.0	13.0
Bluetooth EDR	3Mbps	18.00	16.00	18.00	16.00	15.0	13.0
Bluetooth LE	1Mbps	20.00	18.00	18.25	16.25	18.0	16.0
Bluetooth LE	2Mbps	20.00	18.00	18.25	16.25	18.0	16.0
Bluetooth LE	125kbps	14.00	12.00	14.00	12.00	N/A	N/A
Bluetooth LE	500kbps	14.00	12.00	14.00	12.00	N/A	N/A

FCC ID: C3K2076	SAR EVALUATION REPORT		Approved by: Technical Manager
Document S/N: 1M2312190129-01.C3K	DUT Type: Portable Computing Device		Page 9 of 40

The below table is applicable in the following conditions:

- Tablet Mode with motion sensor active and WLAN active

Mode	Data Rate	Modulated Output Power (in dBm)					
		Single Antenna				Each Chain in Beam Forming Mode	
		Antenna R		Antenna L		Beam Forming	
Maximum / Nominal Power		Max	Nom.	Max	Nom.	Max	Nom.
Bluetooth	1Mbps	14.75	12.75	13.00	11.00	13.0	11.0
Bluetooth EDR	2Mbps	14.75	12.75	13.00	11.00	13.0	11.0
Bluetooth EDR	3Mbps	14.75	12.75	13.00	11.00	13.0	11.0
Bluetooth LE	1Mbps	14.75	12.75	13.00	11.00	13.0	11.0
Bluetooth LE	2Mbps	14.75	12.75	13.00	11.00	13.0	11.0
Bluetooth LE	125kbps	14.00	12.00	13.00	11.00	N/A	N/A
Bluetooth LE	500kbps	14.00	12.00	13.00	11.00	N/A	N/A

FCC ID: C3K2076	SAR EVALUATION REPORT	Approved by: Technical Manager
Document S/N: 1M2312190129-01.C3K	DUT Type: Portable Computing Device	Page 10 of 40

1.6 DUT Antenna Locations

The overall dimensions of this device is > 200 mm. A diagram showing the location of the device antennas can be found in the DUT Antenna Diagram and SAR Test Setup Photographs Appendix. Exact dimensions and separation distances are shown in the Technical Descriptions in the FCC filings.

Table 1-1
Device Edges/Sides for SAR Testing Laptop Mode

Antenna	Back	Front	Top	Bottom	Right	Left
R	Yes	No	Yes	Yes	Yes	No
L	Yes	No	Yes	Yes	No	Yes

Table 1-2
Device Edges/Sides for SAR Testing Tablet Mode

Antenna	Back	Front	Top	Bottom	Right	Left
R	Yes	No	Yes	Yes	Yes	No
L	Yes	No	Yes	Yes	No	Yes

Note: Note: Per FCC KDB Publication 616217 D04v01r01, particular edges were not required to be evaluated for SAR based on the SAR exclusion threshold in KDB 447498 D04v01. Additional edges may have been evaluated for simultaneous transmission analysis.

FCC ID: C3K2076	SAR EVALUATION REPORT	Approved by: Technical Manager
Document S/N: 1M2312190129-01.C3K	DUT Type: Portable Computing Device	Page 11 of 40

1.7 Simultaneous Transmission Capabilities

According to FCC KDB Publication 447498 D01v06, 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 D01v06 4.3.2 procedures.

Table 1-3
Simultaneous Transmission Scenarios

No.	Capable Transmit Configuration	Laptop	Tablet
1	2.4 GHz WLAN MIMO	Yes	Yes
2	5 GHz WLAN MIMO	Yes	Yes
3	6 GHz WLAN MIMO	Yes	Yes
4	2.4 GHz Bluetooth Beam Forming	Yes	Yes
5	2.4 GHz WLAN Ant R + 2.4 GHz Bluetooth Ant L	Yes	Yes
6	2.4 GHz Bluetooth Ant R + 2.4 GHz WLAN Ant L	Yes	Yes
7	5 GHz WLAN Ant R + 2.4 GHz Bluetooth Ant L	Yes	Yes
8	6 GHz WLAN Ant R + 2.4 GHz Bluetooth Ant L	Yes	Yes
9	2.4 GHz Bluetooth Ant R + 5 GHz WLAN Ant L	Yes	Yes
10	2.4 GHz Bluetooth Ant R + 6 GHz WLAN Ant L	Yes	Yes
11	5 GHz WLAN MIMO + 2.4 GHz Bluetooth Ant R	Yes	Yes
12	6 GHz WLAN MIMO + 2.4 GHz Bluetooth Ant R	Yes	Yes
13	5 GHz WLAN MIMO + 2.4 GHz Bluetooth Ant L	Yes	Yes
14	6 GHz WLAN MIMO + 2.4 GHz Bluetooth Ant L	Yes	Yes
15	2.4 GHz WLAN MIMO + 5 GHz WLAN MIMO	Yes	Yes
16	2.4 GHz WLAN MIMO + 6 GHz WLAN MIMO	Yes	Yes
17	5 GHz WLAN MIMO + 2.4 GHz WLAN Ant R	Yes	Yes
18	6 GHz WLAN MIMO + 2.4 GHz WLAN Ant R	Yes	Yes
19	5 GHz WLAN MIMO + 2.4 GHz WLAN Ant L	Yes	Yes
20	6 GHz WLAN MIMO + 2.4 GHz WLAN Ant L	Yes	Yes
21	2.4 GHz Bluetooth Ant R + 2.4 GHz WLAN Ant L + 5 GHz WLAN Ant L	Yes	Yes
22	2.4 GHz Bluetooth Ant R + 2.4 GHz WLAN Ant L + 6 GHz WLAN Ant L	Yes	Yes
23	2.4 GHz WLAN Ant R + 5 GHz WLAN Ant R + 2.4 GHz Bluetooth Ant L	Yes	Yes
24	2.4 GHz WLAN Ant R + 6 GHz WLAN Ant R + 2.4 GHz Bluetooth Ant L	Yes	Yes
25	5 GHz WLAN MIMO + 2.4 GHz Bluetooth Ant R + 2.4 GHz WLAN Ant L	Yes	Yes
26	6 GHz WLAN MIMO + 2.4 GHz Bluetooth Ant R + 2.4 GHz WLAN Ant L	Yes	Yes
27	5 GHz WLAN MIMO + 2.4 GHz WLAN Ant R + 2.4 GHz Bluetooth Ant L	Yes	Yes
28	6 GHz WLAN MIMO + 2.4 GHz WLAN Ant R + 2.4 GHz Bluetooth Ant L	Yes	Yes
29	2.4 GHz WLAN Ant R + 5 GHz WLAN Ant L	Yes	Yes
30	2.4 GHz WLAN Ant R + 6 GHz WLAN Ant L	Yes	Yes
31	5 GHz WLAN Ant R + 2.4 GHz WLAN Ant L	Yes	Yes
32	6 GHz WLAN Ant R + 2.4 GHz WLAN Ant L	Yes	Yes
33	5 GHz WLAN Ant L + 2.4 GHz Bluetooth Ant L	Yes	Yes
34	6 GHz WLAN Ant L + 2.4 GHz Bluetooth Ant L	Yes	Yes
35	5 GHz WLAN Ant R + 2.4 GHz Bluetooth Ant R	Yes	Yes
36	6 GHz WLAN Ant R + 2.4 GHz Bluetooth Ant R	Yes	Yes
37	2.4 GHz WLAN MIMO + 5 GHz WLAN Ant R	Yes	Yes
38	2.4 GHz WLAN MIMO + 6 GHz WLAN Ant R	Yes	Yes
39	2.4 GHz WLAN MIMO + 5 GHz WLAN Ant L	Yes	Yes
40	2.4 GHz WLAN MIMO + 6 GHz WLAN Ant L	Yes	Yes
41	2.4 GHz WLAN Ant L + 5 GHz WLAN Ant L	Yes	Yes
42	2.4 GHz WLAN Ant L + 6 GHz WLAN Ant L	Yes	Yes
43	2.4 GHz WLAN Ant R + 5 GHz WLAN Ant R	Yes	Yes
44	2.4 GHz WLAN Ant R + 6 GHz WLAN Ant R	Yes	Yes
45	5 GHz WLAN MIMO + 2.4 GHz Bluetooth Beam Forming	Yes	Yes
46	6 GHz WLAN MIMO + 2.4 GHz Bluetooth Beam Forming	Yes	Yes

- 2.4 GHz WLAN Antenna R and 2.4 GHz Bluetooth Ant R share the same antenna path and cannot transmit simultaneously.
- 2.4 GHz WLAN Antenna L and 2.4 GHz Bluetooth Ant L share the same antenna path and cannot transmit simultaneously.
- 5 GHz WLAN and 6 GHz WLAN share the same antenna path and cannot transmit simultaneously.
- This device supports 2x2 MIMO Tx for WLAN 802.11a/g/n/ac/ax/be. 802.11a/g/n/ac/ax/be supports CDD and STBC and 802.11n/ac/ax/be additionally supports SDM.
- This device supports Bluetooth Tethering.

FCC ID: C3K2076	SAR EVALUATION REPORT	Approved by: Technical Manager
Document S/N: 1M2312190129-01.C3K	DUT Type: Portable Computing Device	Page 12 of 40

1.8 Miscellaneous SAR Test Considerations

This device supports IEEE 802.11ac with the following features:

- a) Up to 160 MHz Bandwidth only
- b) No aggregate channel configurations
- c) 2 Tx antenna output
- d) 256 QAM is supported
- e) TDWR and Band gap channels are supported

This device supports IEEE 802.11ax/be with the following features:

- a) Up to 320 MHz Bandwidth only for 6 GHz
- b) Up to 160 MHz Bandwidth only for 5 GHz
- c) Up to 40 MHz Bandwidth only for 2.4 GHz
- d) 2 Tx antenna output
- e) Up to 1024 QAM is supported
- f) TDWR and Band gap channels are supported for 5/6 GHz
- g) MU-MIMO UL Operations are not supported

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.

Per FCC guidance, SAR was performed using 6.5 GHz SAR probe calibration factors. FCC KDB 648474 and FCC KDB 248227 were followed for test positions, distances, and modes. Per TCB workshop October 2020 notes, 5 channels were tested. 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 $\geq$ -1dB per equipment manufacturer guidance. Power density results are scaled up for uncertainty above 30%.

Per FCC Guidance, 802.11ax/be RU was considered a higher order 802.11 mode when compared to a/b/g/n/ac to apply KDB Publication 248227 D01v02r02 for OFDM mode selection. Therefore, SAR tests were not required for 802.11ax/be RU based on the maximum allowed output powers of OFDM modes and the reported SAR values. Per FCC Guidance, maximum conducted powers were performed for each RU size to demonstrate that the output powers would not be higher than the other OFDM 802.11 modes. Please see Measurement Report SN 1M2204040049-02.C3K for 802.11ax/be RU output powers.

When 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.

FCC ID: C3K2076	SAR EVALUATION REPORT	Approved by: Technical Manager
Document S/N: 1M2312190129-01.C3K	DUT Type: Portable Computing Device	Page 13 of 40

1.9 Guidance Applied

- IEEE 1528-2013
- FCC KDB Publication 248227 D01v02r02 (SAR Considerations for 802.11 Devices)
- FCC KDB Publication 447498 D04v01 (Interim General SAR Guidance)
- FCC KDB Publication 865664 D01v01r04, D02v01r02 (SAR Measurements up to 6 GHz)
- FCC KDB Publication 616217 D04v01r02 (Tablet/Laptop)
- FCC KDB 648474 D04 (Accessories)
- April 2019 TCB Workshop Notes (IEEE 802.11ax)
- IEC/IEEE 63195-1:2022
- IEC 62479:2010
- November 2017, October 2018, April 2019, November 2019, October 2020 TCB Workshop Notes (IEEE 802.11ax)
- SPEAG DASY6 System Handbook
- SPEAG DASY6 Application Note (Interim Procedures for Devices Operating at 6-10 GHz) (Nov 2021)

1.10 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.

1.11 Bibliography

Report Type	Report Serial Number
RF Exposure Part 0 Test Report – Reference Model	Appendix D: Part 0
RF Exposure Part 1 Test Report – Reference Model	Appendix D: Part 1
RF Exposure Part 2 Test Report – Reference Model	Appendix D Part 2
RF Exposure Compliance Summary Report	1M2312190129-02.C3K

FCC ID: C3K2076	SAR EVALUATION REPORT	Approved by: Technical Manager
Document S/N: 1M2312190129-01.C3K	DUT Type: Portable Computing Device	Page 14 of 40

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]

FCC ID: C3K2076	SAR EVALUATION REPORT	Approved by: Technical Manager
Document S/N: 1M2312190129-01.C3K	DUT Type: Portable Computing Device	Page 15 of 40

3.1 Measurement Procedure

The evaluation was performed using the following procedure compliant to FCC KDB Publication 865664 D01v01r04 and IEEE 1528-2013:

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) and IEEE 1528-2013.
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) and IEEE 1528-2013. 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.

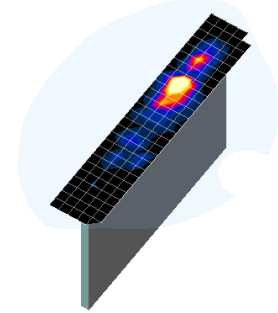


Figure 3-1
Sample SAR Area Scan

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	Graded Grid		
			$\Delta z_{\text{zoom}}(n)$	$\Delta z_{\text{zoom}}(1)^*$	$\Delta z_{\text{zoom}}(n>1)^*$	
≤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

FCC ID: C3K2076	SAR EVALUATION REPORT		Approved by:
			Technical Manager
Document S/N:	DUT Type:		Page 16 of 40
1M2312190129-01.C3K	Portable Computing Device		

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 $\delta = 0.02$.

4.2 SAR Testing for Tablet per KDB Publication 616217 D04v01r02

Per FCC KDB Publication 616217 D04v01r02, the back surface and edges of the tablet should be tested for SAR compliance with the tablet touching the phantom. The SAR Exclusion Threshold in KDB 447498 D01v06 can be applied to determine SAR test exclusion for adjacent edge configurations. The closest distance from the antenna to an adjacent tablet edge is used to determine if SAR testing is required for the adjacent edges, with the adjacent edge positioned against the phantom and the edge containing the antenna positioned perpendicular to the phantom.

FCC ID: C3K2076	SAR EVALUATION REPORT	Approved by: Technical Manager
Document S/N: 1M2312190129-01.C3K	DUT Type: Portable Computing Device	Page 17 of 40

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.

FCC ID: C3K2076	SAR EVALUATION REPORT	Approved by: Technical Manager
Document S/N: 1M2312190129-01.C3K	DUT Type: Portable Computing Device	Page 18 of 40

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/m^2 or mW/cm^2 .

Peak Spatially Averaged Power Density was evaluated over a circular area of 4 cm^2 per interim FCC Guidance for near-field power density evaluations per October 2018 TCB Workshop notes.

Table 5-2
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/cm^2 is 10 W/m^2

FCC ID: C3K2076	SAR EVALUATION REPORT	Approved by: Technical Manager
Document S/N: 1M2312190129-01.C3K	DUT Type: Portable Computing Device	Page 19 of 40

6 FCC MEASUREMENT PROCEDURES

6.1 Measured and Reported SAR

Per FCC KDB Publication 447498 D01v06, 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.

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

FCC ID: C3K2076	SAR EVALUATION REPORT	Approved by: Technical Manager
Document S/N: 1M2312190129-01.C3K	DUT Type: Portable Computing Device	Page 20 of 40

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, 802.11n and 802.11ac 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 and 802.11ac 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).

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.

FCC ID: C3K2076	SAR EVALUATION REPORT	Approved by: Technical Manager
Document S/N: 1M2312190129-01.C3K	DUT Type: Portable Computing Device	Page 21 of 40

6.2.8 MIMO SAR considerations

Per KDB Publication 248227 D01v02r02, the simultaneous SAR provisions in KDB Publication 447498 D01v06 should be applied to determine simultaneous transmission SAR test exclusion for WIFI MIMO. If the sum of 1g single transmission chain SAR measurements is <1.6 W/kg, no additional SAR measurements for MIMO are required. Alternatively, SAR for MIMO can be measured with all antennas transmitting simultaneously at the specified maximum output power of MIMO operation.

FCC ID: C3K2076	SAR EVALUATION REPORT	Approved by: Technical Manager
Document S/N: 1M2312190129-01.C3K	DUT Type: Portable Computing Device	Page 22 of 40

7 RF CONDUCTED POWERS

7.1 WLAN Conducted Powers

Table 7-1
2.4 GHz WLAN Measured Power for Data Referencing – Antenna L

2.4GHz WIFI (20MHz 802.11b SISO ANTL)			
Freq. [MHz]	Channel	Detector	Conducted Power [dBm]
2437	6	Average	17.10

Table 7-2
5 GHz WLAN Measured Power for Data Referencing – Antenna L

5GHz WIFI (20MHz 802.11a SISO ANTL)			
Band	Freq. [MHz]	Channel	Avg. Conducted Power [dBm]
UNII-1	5180	36	18.22

Table 7-3
6 GHz WLAN Measured Power for Data Referencing – Antenna L

6GHz WIFI (80MHz 802.11ax SISO ANTL)				6GHz WIFI (40MHz 802.11ax SISO ANTL)			
Band	Freq. [MHz]	Channel	Avg. Conducted Power [dBm]	Band	Freq. [MHz]	Channel	Avg. Conducted Power [dBm]
UNII-5	5985	7	13.21	UNII-5	6005	11	19.90

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.

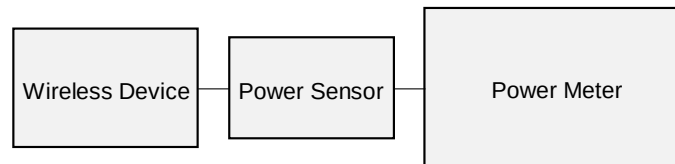


Figure 7-1
Power Measurement Setup

FCC ID: C3K2076	SAR EVALUATION REPORT	Approved by: Technical Manager
Document S/N: 1M2312190129-01.C3K	DUT Type: Portable Computing Device	Page 23 of 40

7.2 Bluetooth Conducted Powers

Table 7-4
DSS Measured Power for Data Referencing - Antenna L

Frequency [MHz]	Channel No.	Avg Conducted Power	
		[dBm]	[mW]
2441	39	18.20	66.069

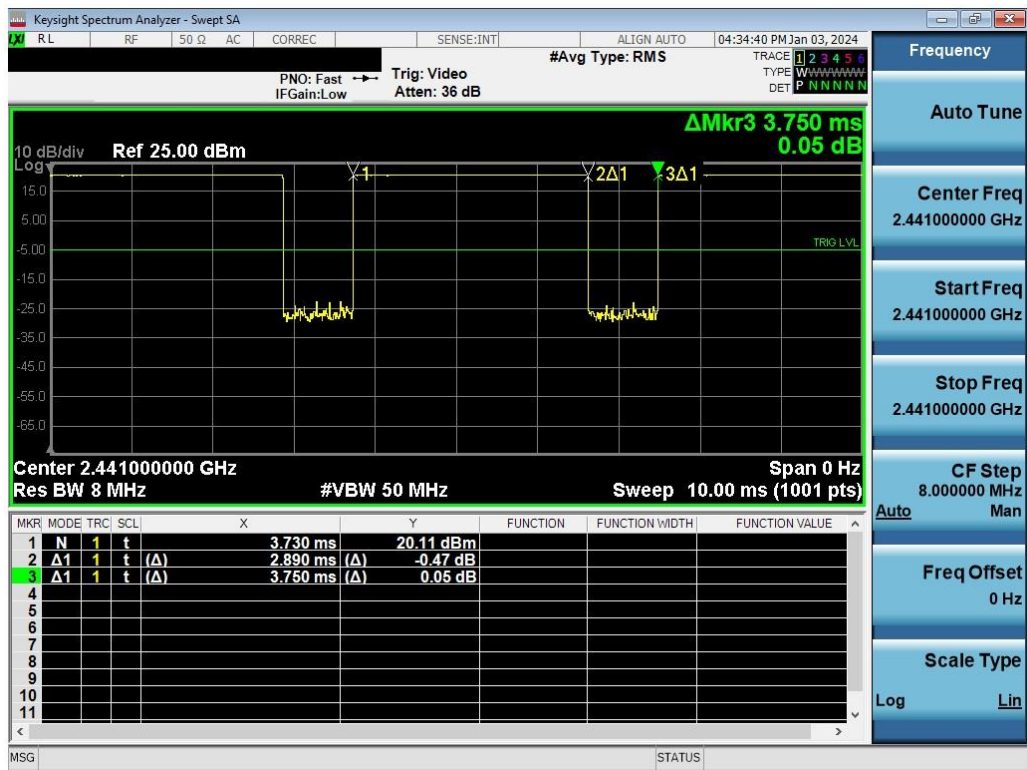


Figure 7-2
Bluetooth Antenna 2 Transmission Plot

Equation 7-1
Bluetooth Antenna 2 Duty Cycle Calculation

$$\text{Duty Cycle} = \frac{\text{Pulse Width}}{\text{Period}} * 100\% = \frac{2.89\text{ms}}{3.75\text{ms}} * 100\% = 77.1\%$$

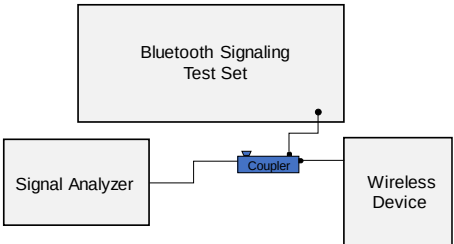


Figure 7-3
Power Measurement Setup

FCC ID: C3K2076	SAR EVALUATION REPORT	Approved by: Technical Manager
Document S/N: 1M2312190129-01.C3K	DUT Type: Portable Computing Device	Page 24 of 40

8

SYSTEM VERIFICATION

8.1 Tissue Verification

Table 8-1
Measured 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
03/13/2024	2450 Head	21.9	2300	1.718	40.458	1.670	39.500	2.87%	2.43%
			2310	1.728	40.447	1.679	39.480	2.80%	2.45%
			2320	1.733	40.432	1.687	39.460	2.73%	2.46%
			2400	1.795	40.313	1.756	39.289	2.22%	2.61%
			2450	1.835	40.233	1.800	39.200	1.94%	2.64%
			2480	1.859	40.184	1.833	39.162	1.42%	2.61%
			2500	1.874	40.146	1.855	39.136	1.02%	2.58%
			2510	1.881	40.127	1.866	39.123	0.80%	2.57%
			2535	1.902	40.083	1.893	39.092	0.48%	2.54%
			2550	1.915	40.062	1.909	39.073	0.31%	2.53%
			2560	1.923	40.051	1.920	39.060	0.16%	2.54%
			2600	1.954	39.985	1.964	39.009	-0.51%	2.50%
			2650	1.995	39.894	2.018	38.945	-1.14%	2.44%
			2680	2.020	39.849	2.051	38.907	-1.51%	2.42%
			2700	2.036	39.812	2.073	38.882	-1.78%	2.39%
			2300	1.719	38.893	1.670	39.500	2.93%	-1.54%
			2310	1.727	38.883	1.679	39.480	2.86%	-1.51%
			2320	1.735	38.872	1.687	39.460	2.85%	-1.49%
			2400	1.791	38.771	1.756	39.289	1.99%	-1.32%
03/29/2024	2450 Head	24.1	2450	1.830	38.696	1.800	39.200	1.67%	-1.29%
			2480	1.851	38.651	1.833	39.162	0.98%	-1.30%
			2500	1.866	38.616	1.855	39.136	0.59%	-1.33%
			2510	1.873	38.598	1.866	39.123	0.38%	-1.34%
			2535	1.893	38.552	1.893	39.092	0.00%	-1.38%
			2550	1.905	38.528	1.909	39.073	-0.21%	-1.39%
			2560	1.914	38.511	1.920	39.060	-0.31%	-1.41%
			2600	1.944	38.455	1.964	39.009	-1.02%	-1.42%
			2650	1.980	38.348	2.018	38.945	-1.88%	-1.53%
			2680	2.005	38.294	2.051	38.907	-2.24%	-1.58%
			2700	2.019	38.277	2.073	38.882	-2.60%	-1.56%
			5180	4.480	35.224	4.635	36.009	-3.34%	-2.18%
			5190	4.492	35.207	4.645	35.998	-3.29%	-2.20%
			5200	4.506	35.186	4.655	35.986	-3.20%	-2.22%
			5210	4.518	35.164	4.666	35.975	-3.17%	-2.25%
			5220	4.529	35.140	4.676	35.963	-3.14%	-2.29%
			5240	4.551	35.118	4.696	35.940	-3.09%	-2.29%
			5250	4.562	35.114	4.706	35.929	-3.06%	-2.27%
			5260	4.570	35.099	4.717	35.917	-3.12%	-2.28%
			5270	4.577	35.071	4.727	35.906	-3.17%	-2.33%
04/01/2024	5200-5800 Head	20.9	5280	4.587	35.034	4.737	35.894	-3.17%	-2.40%
			5290	4.599	35.007	4.748	35.883	-3.14%	-2.44%
			5300	4.615	34.987	4.758	35.871	-3.01%	-2.46%
			5310	4.631	34.979	4.768	35.860	-2.87%	-2.46%
			5320	4.642	34.974	4.778	35.849	-2.85%	-2.44%
			5500	4.844	34.662	4.963	35.643	-2.40%	-2.75%
			5510	4.854	34.653	4.973	35.632	-2.39%	-2.75%
			5520	4.859	34.641	4.983	35.620	-2.49%	-2.75%
			5530	4.866	34.622	4.994	35.609	-2.56%	-2.77%
			5540	4.876	34.593	5.004	35.597	-2.56%	-2.82%
			5550	4.891	34.559	5.014	35.586	-2.45%	-2.89%
			5560	4.906	34.531	5.024	35.574	-2.35%	-2.93%
			5580	4.933	34.508	5.045	35.551	-2.22%	-2.93%
			5600	4.952	34.491	5.065	35.529	-2.23%	-2.92%
			5610	4.961	34.474	5.076	35.518	-2.27%	-2.94%
			5620	4.971	34.444	5.086	35.506	-2.26%	-2.99%
			5640	4.995	34.391	5.106	35.483	-2.17%	-3.08%
			5660	5.023	34.367	5.127	35.460	-2.03%	-3.08%
			5670	5.034	34.353	5.137	35.448	-2.01%	-3.09%
			5680	5.042	34.339	5.147	35.437	-2.04%	-3.10%
			5690	5.050	34.323	5.158	35.426	-2.09%	-3.11%
			5700	5.059	34.304	5.168	35.414	-2.11%	-3.13%
			5710	5.073	34.289	5.178	35.403	-2.03%	-3.15%
			5720	5.085	34.264	5.188	35.391	-1.99%	-3.18%
			5745	5.113	34.210	5.214	35.363	-1.94%	-3.26%
			5750	5.121	34.204	5.219	35.357	-1.88%	-3.26%
			5755	5.129	34.203	5.224	35.351	-1.82%	-3.25%
			5765	5.143	34.198	5.234	35.340	-1.74%	-3.23%
			5775	5.150	34.184	5.245	35.329	-1.81%	-3.24%
			5785	5.157	34.162	5.255	35.317	-1.86%	-3.27%
			5795	5.168	34.140	5.265	35.305	-1.84%	-3.30%
			5800	5.174	34.124	5.270	35.300	-1.82%	-3.33%
			5805	5.174	34.124	5.270	35.300	-1.82%	-3.33%
			5805	5.180	34.110	5.275	35.294	-1.80%	-3.35%
			5825	5.205	34.078	5.296	35.271	-1.72%	-3.39%
			5835	5.218	34.059	5.305	35.230	-1.64%	-3.32%
			5845	5.228	34.048	5.315	35.210	-1.64%	-3.30%
			5850	5.233	34.044	5.320	35.200	-1.64%	-3.28%
			5855	5.237	34.039	5.325	35.197	-1.65%	-3.29%
			5865	5.246	34.025	5.336	35.190	-1.69%	-3.31%
			5865	5.246	34.025	5.336	35.190	-1.69%	-3.31%
			5865	5.246	34.025	5.336	35.190	-1.69%	-3.31%
			5865	5.246	34.025	5.336	35.190	-1.69%	-3.31%
			5875	5.259	34.000	5.347	35.183	-1.65%	-3.36%
			5885	5.273	33.974	5.357	35.177	-1.57%	-3.42%
			5905	5.292	33.948	5.379	35.163	-1.62%	-3.46%

FCC ID: C3K2076	SAR EVALUATION REPORT	Approved by: Technical Manager
Document S/N: 1M2312190129-01.C3K	DUT Type: Portable Computing Device	Page 25 of 40

Table 8-2
Measured Tissue Properties Cont'd

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
03/12/2024	6000 Head	19.7	5935	5.568	34.264	5.411	35.143	2.90%	-2.50%
			5970	5.602	34.186	5.448	35.120	2.83%	-2.66%
			5985	5.622	34.135	5.464	35.110	2.89%	-2.78%
			6000	5.643	34.110	5.480	35.100	2.97%	-2.82%
			6025	5.687	34.072	5.510	35.070	3.21%	-2.85%
			6065	5.732	34.003	5.557	35.022	3.15%	-2.91%
			6075	5.739	33.968	5.569	35.010	3.05%	-2.98%
			6085	5.742	33.947	5.580	34.998	2.90%	-3.00%
			6185	5.877	33.767	5.698	34.878	3.14%	-3.19%
			6275	5.998	33.587	5.805	34.770	3.32%	-3.40%
			6285	5.999	33.583	5.816	34.758	3.15%	-3.38%
			6305	6.035	33.591	5.840	34.734	3.34%	-3.29%
			6345	6.086	33.488	5.887	34.686	3.38%	-3.45%
			6475	6.259	33.224	6.041	34.530	3.61%	-3.78%
			6485	6.273	33.236	6.052	34.518	3.65%	-3.71%
			6500	6.289	33.245	6.070	34.500	3.61%	-3.64%
			6505	6.289	33.246	6.076	34.494	3.51%	-3.62%
			6545	6.324	33.154	6.122	34.446	3.30%	-3.75%
			6665	6.449	32.882	6.265	34.302	2.94%	-4.14%
			6675	6.473	32.871	6.273	34.290	3.19%	-4.14%
			6685	6.495	32.833	6.285	34.278	3.34%	-4.22%
			6715	6.519	32.816	6.319	34.242	3.17%	-4.16%
			6785	6.622	32.649	6.400	34.158	3.47%	-4.42%
			6825	6.675	32.578	6.447	34.110	3.54%	-4.49%
			6985	6.842	32.375	6.633	33.918	3.15%	-4.55%
			6995	6.837	32.387	6.644	33.906	2.90%	-4.48%
			7000	6.842	32.391	6.650	33.900	2.89%	-4.45%
			7005	6.850	32.382	6.656	33.894	2.91%	-4.46%
			7025	6.899	32.240	6.680	33.870	3.28%	-4.81%

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 IEC/IEEE 62209-1528:2020). The tissue parameters listed in the SAR test plots may slightly differ from the table above due to significant digit rounding in the software.

FCC ID: C3K2076	SAR EVALUATION REPORT	Approved by: Technical Manager
Document S/N: 1M2312190129-01.C3K	DUT Type: Portable Computing Device	Page 26 of 40

8.2 Test System Verification

Prior to SAR assessment, the system is verified to +/- 10% of the SAR measurement on the reference dipole at the time of calibration by the calibration facility.

Table 8-3
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 (%)	Measured SAR 10g (W/kg)	1W Target SAR 10g (W/kg)	1W Normalized SAR 10g (W/kg)	Deviation 10g (%)
J	2450	HEAD	03/13/2024	22.7	21.9	0.10	981	7670	1449	4.990	53.900	49.900	-7.42%	2.320	25.400	23.200	-8.66%
O	2450	HEAD	03/28/2024	24.3	24.0	0.10	719	7803	1533	5.030	55.000	50.300	-8.55%	2.360	25.700	23.600	-8.17%
O	5250	HEAD	04/01/2024	20.9	20.9	0.05	1057	7803	1533	3.820	79.400	76.400	-3.78%	1.100	22.700	22.000	-3.08%
O	5600	HEAD	04/01/2024	22.3	20.9	0.05	1057	7803	1533	4.050	82.800	81.000	-2.17%	1.160	23.600	23.200	-1.69%
O	5750	HEAD	04/01/2024	22.3	20.9	0.05	1057	7803	1533	3.670	79.800	73.400	-8.02%	1.050	22.700	21.000	-7.49%
O	5850	HEAD	04/01/2024	22.3	20.9	0.05	1057	7803	1533	3.820	81.500	76.400	-6.26%	1.070	23.000	21.400	-6.96%
R	6500	HEAD	03/12/2024	22.7	19.9	0.03	1018	7410	1638	7.570	293.000	302.800	3.34%	1.380	53.900	55.200	2.41%

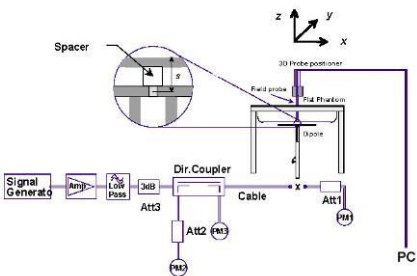


Figure 8-1
System Verification Setup Diagram



Figure 8-2
System Verification Setup Photo

FCC ID: C3K2076	SAR EVALUATION REPORT	Approved by: Technical Manager
Document S/N: 1M2312190129-01.C3K	DUT Type: Portable Computing Device	Page 27 of 40

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.

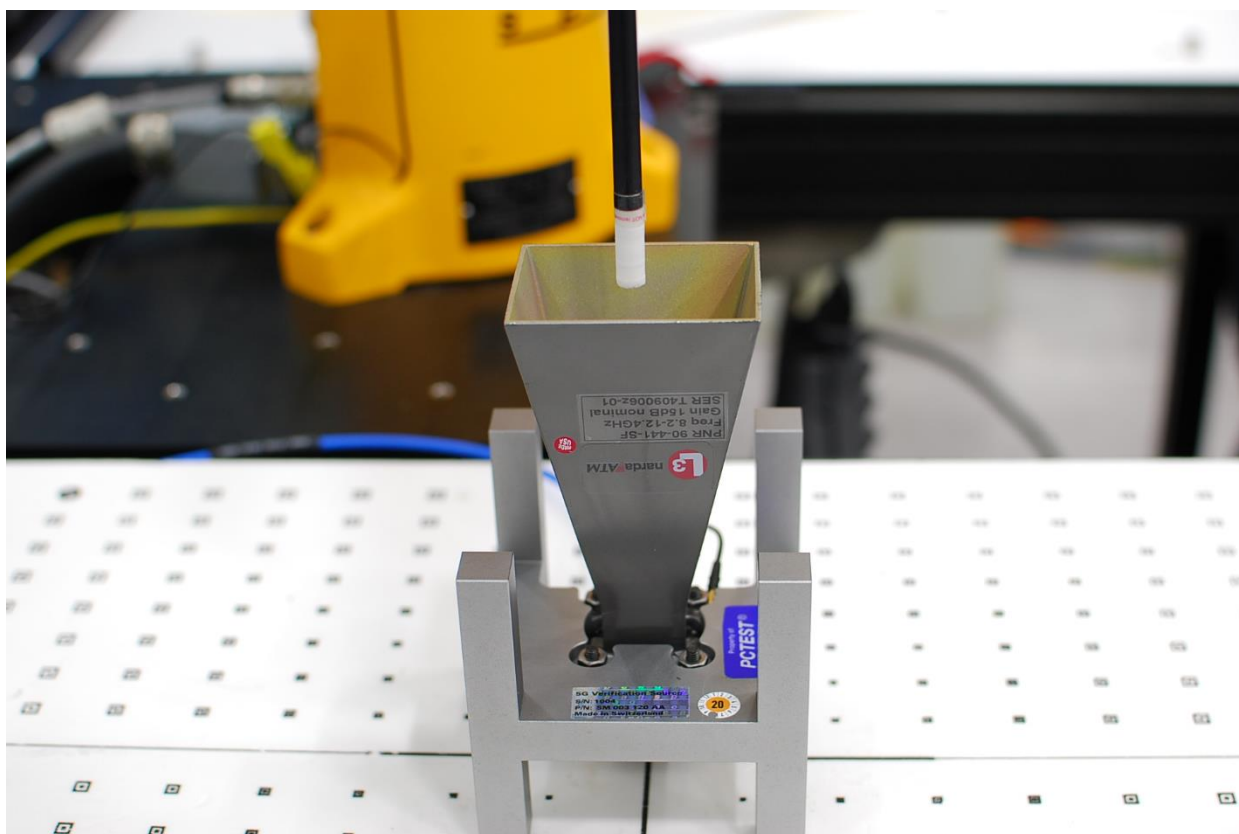


Figure 8-3
System Verification Setup Photo

FCC ID: C3K2076	SAR EVALUATION REPORT	Approved by: Technical Manager
Document S/N: 1M2312190129-01.C3K	DUT Type: Portable Computing Device	Page 28 of 40

**Table 8-4
10 GHz Verifications**

System Verification											
System	Frequency (GHz)	Date	Source S/N	Probe S/N	Prad (mW)	Normal psPD (W/m ² over 4 cm ²)		Deviation (dB)	Total psPD (W/m ² over 4 cm ²)		Deviation (dB)
						Measured	Target		Measured	Target	
Q	10	04/02/2024	1002	9622	93.3	53.90	54.60	-0.06	54.10	54.90	-0.06

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

FCC ID: C3K2076	SAR EVALUATION REPORT	Approved by: Technical Manager
Document S/N: 1M2312190129-01.C3K	DUT Type: Portable Computing Device	Page 29 of 40

9 SAR DATA SUMMARY

9.1 Standalone Body SAR Data

Table 9-3
DTS Spot-check Verification for Data Referencing

Exposure	Band / Mode	Bandwidth [MHz]	Service / Modulation	Ant.	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]	Reported SAR for Reference Model (1g)
Body	2.4 GHz WiFi/ IEEE 802.11b	22	DSSS	L	1YCG2	98.08	0.01	2437.00	6	1	17.5	17.10	Top	0	0.622	1.096	1.020	0.695	0.707
ANSI/IEEE C95.1 1992 - SAFETY LIMIT Spatial Peak Uncontrolled Exposure/General Population													Body 1.6 W/kg (mW/g) averaged over 1 gram						

Table 9-3
DSS Spot-check Verification for Data Referencing

Exposure	Band / Mode	Service / Modulation	Ant.	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]	Reported SAR for Reference Model (1g)
Body	2.4 GHz Bluetooth	FHSS	L	1YBY2	77.10	0.04	2441.00	39	1	18.25	18.20	Top	0	0.396	1.012	1.025	0.411	0.785
ANSI/IEEE C95.1 1992 - SAFETY LIMIT Spatial Peak Uncontrolled Exposure/General Population													Body 1.6 W/kg (mW/g) averaged over 1 gram					

Table 9-4
NII Spot-check Verification for Data Referencing

Exposure	Band / Mode	Bandwidth [MHz]	Service / Modulation	Ant.	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]	Reported SAR for Reference Model (1g)
Body	5 GHz WiFi/ IEEE 802.11a	20	OFDM	L	1YCG2	99.05	-0.10	5180.00	36	U-NII-1	6.5	18.75	18.22	Top	0	0.583	1.130	1.010	0.665	0.666
ANSI/IEEE C95.1 1992 - SAFETY LIMIT Spatial Peak Uncontrolled Exposure/General Population														Body 1.6 W/kg (mW/g) averaged over 1 gram						

Table 9-5
6CD Spot-check Verification for Data Referencing

Exposure	Band / Mode	Bandwidth [MHz]	Service / Modulation	Ant.	Serial Number	Duty Cycle [%]	Power Drift [dB]	Frequency [MHz]	Channel #	Data Rate	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]	Reported SAR for Reference Model (1g)
Body	6 GHz WiFi/ IEEE 802.11ax	80	OFDM	L	1YBY2	99.40	0.08	5985.00	7	34	14.00	13.21	Top	0	0.285	1.199	1.006	0.344	0.352
ANSI/IEEE C95.1 1992 - SAFETY LIMIT Spatial Peak Uncontrolled Exposure/General Population													Body 1.6 W/kg (mW/g) averaged over 1 gram						

Exposure	Band/ Mode	Bandwidth [MHz]	Service/ Modulation	Ant.	Serial Number	Duty Cycle [%]	Power Drift [dB]	Frequency [MHz]	Channel #	Data Rate	Max Allowed Power [dBm]	Conducted Power [dBm]	Test Position	Spacing [mm]	Measured APD [W/m ² (4cm ²)]	Power Scaling Factor	Duty Cycle Scaling Factor	Reported APD [W/m ² (4cm ²)]	Reported APD for Reference Model
Body	6 GHz WiFi/ IEEE 802.11ax	80	OFDM	L	1YBY2	99.4	0.08	5985.00	7	34	14.00	13.21	Top	0	2.300	1.199	1.006	2.774	2.883

MEASUREMENT RESULTS																			
Frequency [MHz]	Channel	Mode	Service	Bandwidth [MHz]	Maximum Allowed Power (Ant 1) [dBm]	Conducted Power (Ant 1) [dBm]	Power Drift [dB]	Spacing [mm]	Antenna Config.	Configuration	DUT Serial Number	Data Rate [Mbps]	Side	Duty Cycle (%)	Grid Step (A)	Scaling Factor for Measurement Uncertainty per IEC 62479	Scaling Factor (Power)	Scaling Factor (Duty Cycle)	Normal psPD [W/m ²]
6005.00	11	802.11ax	OFDM	40	20.00	19.90	0.17	25	L	Tablet	1YCG2	MC90	Top	99.57	0.125	1.554	1.023	1.004	2.950
47 CFR 81.1310 - SAFETY LIMIT Spatial Average Uncontrolled Exposure / General Population										Power Density 10 W/m ² averaged over 4 cm ²									

FCC ID: C3K2076	SAR EVALUATION REPORT	Approved by: Technical Manager
Document S/N: 1M2312190129-01.C3K	DUT Type: Portable Computing Device	Page 30 of 40

9.2 SAR and Absorbed Power Density Test Notes:

General Notes:

1. The test data reported are the worst-case SAR values according to test procedures specified in IEEE 1528-2013, FCC KDB Publication 447498 D04v01, and FCC KDB Publication 616217 D04v01r02.
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.
7. This device uses Qualcomm FastConnect TAS for WLAN operations to control and manage transmitting power in real time to ensure RF Exposure compliance. Per FCC Guidance, compliance for was assessed at the minimum of the time averaged power and the maximum output power for each band/mode/exposure condition (DSI).
8. Per October 2020 TCB Workshop notes, absorbed power density (APD) using a 4cm² averaging area is reported based on SAR measurements.
9. FCC KDB Publication 616217 D04v01r02 Section 4.3, SAR tests are required for the back surface and edges of the tablet with the tablet touching the phantom. The SAR Exclusion Threshold in FCC KDB 447498 D04v01 was applied to determine SAR test exclusion for adjacent edge configurations.
10. Per FCC KDB 616217 D04, SAR is evaluated for the bottom surface of a keyboard when it is attached to the DUT in laptop configuration.
11. Per FCC Guidance, SAR tests are required for the back surface and edges of the tablet with the tablet 25mm away from the phantom when the motion sensor is not active. The SAR Exclusion Threshold in FCC KDB 447498 D04v01 was applied to determine SAR test exclusion for adjacent edge configurations.
12. Per FCC KDB 648474 D04, highest reported SAR tablet configuration for a transmission band on an antenna was additionally evaluated with keyboard accessory attached and folded back at 360°
13. This device is the depopulated version of the fully populated reference model Appendix D: FCC ID: C3K2085. The worst-case configurations of reference model for each equipment class and antenna was selected for spot-check verification with the variant model. The spot-check verification results showed negligible impact of RF exposure from the depopulation therefore, the RF exposure data was referenced based on the reference model test results.
14. The device is sold with either an OLED or LCD display type. Testing was performed with both display types.

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.
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

FCC ID: C3K2076	SAR EVALUATION REPORT	Approved by: Technical Manager
Document S/N: 1M2312190129-01.C3K	DUT Type: Portable Computing Device	Page 31 of 40

reported SAR was scaled to the 100% transmission duty factor to determine compliance. Procedures used to measure the duty factor are identical to that in the associated EMC test reports.

Bluetooth Notes:

1. Bluetooth SAR was measured with the device connected to a call box with hopping disabled with DH5 operation and Tx Tests test mode type. Per October 2016 TCB Workshop Notes, the reported SAR was scaled to the 79.0% transmission duty factor to determine compliance.

Power Density General 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. PTP-PR algorithm was used during psPD measurement and calculations.
8. PD results were scaled to the maximum allowed power to demonstrate compliance per FCC KDB Publication 447498 D04.

FCC ID: C3K2076	SAR EVALUATION REPORT	Approved by: Technical Manager
Document S/N: 1M2312190129-01.C3K	DUT Type: Portable Computing Device	Page 32 of 40

10 FCC MULTI-TX AND ANTENNA SAR CONSIDERATIONS

10.1 Introduction

The following procedures adopted from FCC KDB Publication 447498 D01v06 are applicable to devices with built-in unlicensed transmitters such as 802.11 and Bluetooth devices which may simultaneously.

10.2 Simultaneous Transmission Procedures

This device contains transmitters that may operate simultaneously. Therefore, simultaneous transmission analysis is required. Per FCC KDB Publication 447498 D01v06 4.3.2 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 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.

Please see complete compliance evaluation of reference APPENDIX D (FCC ID C3K2085) in RF Exposure Technical Report

1M2311170118-01.C3K(R1) for standalone reported SAR for models and bands not evaluated for variant models.

10.3 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 D01v06 and IEEE 1528-2013 Section 6.3.4.1.2.

FCC ID: C3K2076	SAR EVALUATION REPORT	Approved by: Technical Manager
Document S/N: 1M2312190129-01.C3K	DUT Type: Portable Computing Device	Page 33 of 40

11 EQUIPMENT LIST

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	7/4/2023	Annual	7/4/2024	MY48180366
Agilent	8753ES	S-Parameter Vector Network Analyzer	1/10/2024	Annual	1/10/2025	MY40001472
Agilent	N4010A	Wireless Connectivity Test Set	N/A	N/A	N/A	GB46170464
Amplifier Research	15S1G6	Amplifier	CBT	N/A	CBT	433973
Amplifier Research	15S1G6	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	ML2496A	Power Meter	6/15/2023	Annual	6/15/2024	1138001
Anritsu	ML2496A	Power Meter	4/4/2023	Annual	4/4/2024	1840005
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	6/15/2023	Annual	6/15/2024	1827530
Anritsu	MA24106A	USB Power Sensor	12/4/2023	Annual	12/4/2024	1520501
Control Company	4052	Long Stem Thermometer	10/16/2023	Biennial	10/16/2025	230703247
Control Company	4052	Long Stem Thermometer	10/16/2023	Biennial	10/16/2025	230702935
Control Company	4052	Long Stem Thermometer	2/17/2023	Biennial	2/17/2025	230111049
Control Company	4040	Therm./ Clock/ Humidity Monitor	1/15/2024	Annual	1/15/2025	160574418
Mitutoyo	500-196-30	CD-6" ASX 6inch Digital Caliper	2/16/2022	Triennial	2/16/2025	A20238413
Keysight Technologies	N6705B	DC Power Analyzer	5/5/2021	Triennial	5/5/2024	MY53004059
Keysight Technologies	N9020A	MXA Signal Analyzer	4/6/2023	Annual	4/6/2024	MY48010233
Agilent	N9020A	MXA Signal Analyzer	4/26/2022	Biennial	4/26/2024	MY56470202
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	VLF-6000+	Low Pass Filter DC to 6000 MHz	7/5/2023	Annual	7/5/2024	31634
Mini-Circuits	BW-N20W5+	DC to 18 GHz Precision Fixed 20 dB Attenuator	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-S3W2	Attenuator (3dB)	CBT	N/A	CBT	120
Seekonk	NC-100	Torque Wrench	CBT	N/A	CBT	22217
Seekonk	NC-100	Torque Wrench	CBT	N/A	CBT	1262
SPEAG	DAK-3.5	Dielectric Assessment Kit	11/13/2023	Annual	11/13/2024	1277
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	D2450V2	2450 MHz SAR Dipole	11/25/2021	Triennial	11/25/2024	981
SPEAG	D2450V2	2450 MHz SAR Dipole	8/18/2021	Triennial	8/18/2024	719
SPEAG	D5GHzV2	5 GHz SAR Dipole	2/21/2024	Annual	2/21/2025	1057
SPEAG	D6.5GHzV2	6.5 GHz SAR Dipole	1/10/2024	Annual	1/10/2025	1018
SPEAG	DAE4	Dasy Data Acquisition Electronics	9/12/2023	Annual	9/12/2024	1449
SPEAG	DAE4	Dasy Data Acquisition Electronics	1/9/2024	Annual	1/9/2025	1533
SPEAG	DAE4ip	Dasy Data Acquisition Electronics	10/18/2023	Annual	10/18/2024	1638
SPEAG	DAE4ip	Dasy Data Acquisition Electronics	11/15/2023	Annual	11/15/2024	1639
SPEAG	EX3DV4	SAR Probe	9/22/2023	Annual	9/22/2024	7670
SPEAG	EX3DV4	SAR Probe	1/11/2024	Annual	1/11/2025	7803
SPEAG	EX3DV4	SAR Probe	7/7/2023	Annual	7/7/2024	7410
SPEAG	EUmmWV4	EUmmWV4 Probe	2/2/2024	Annual	2/2/2025	9622

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.

FCC ID: C3K2076	SAR EVALUATION REPORT	Approved by: Technical Manager
Document S/N: 1M2312190129-01.C3K	DUT Type: Portable Computing Device	Page 34 of 40

12 MEASUREMENT UNCERTAINTIES

Applicable for SAR measurements < 6GHz:

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	E.2.1	7	N	1	1	1	7.0	7.0	∞
Axial Isotropy	E.2.2	0.25	N	1	0.7	0.7	0.2	0.2	∞
Hemishperical Isotropy	E.2.2	1.3	N	1	0.7	0.7	0.9	0.9	∞
Boundary Effect	E.2.3	2	R	1.73	1	1	1.2	1.2	∞
Linearity	E.2.4	0.3	N	1	1	1	0.3	0.3	∞
System Detection Limits	E.2.4	0.25	R	1.73	1	1	0.1	0.1	∞
Modulation Response	E.2.5	4.8	R	1.73	1	1	2.8	2.8	∞
Readout Electronics	E.2.6	0.3	N	1	1	1	0.3	0.3	∞
Response Time	E.2.7	0.8	R	1.73	1	1	0.5	0.5	∞
Integration Time	E.2.8	2.6	R	1.73	1	1	1.5	1.5	∞
RF Ambient Conditions - Noise	E.6.1	3	R	1.73	1	1	1.7	1.7	∞
RF Ambient Conditions - Reflections	E.6.1	3	R	1.73	1	1	1.7	1.7	∞
Probe Positioner Mechanical Tolerance	E.6.2	0.8	R	1.73	1	1	0.5	0.5	∞
Probe Positioning w/ respect to Phantom	E.6.3	6.7	R	1.73	1	1	3.9	3.9	∞
Extrapolation, Interpolation & Integration algorithms for Max. SAR Evaluation	E.5	4	R	1.73	1	1	2.3	2.3	∞
Test Sample Related									
Test Sample Positioning	E.4.2	3.12	N	1	1	1	3.1	3.1	35
Device Holder Uncertainty	E.4.1	1.67	N	1	1	1	1.7	1.7	5
Output Power Variation - SAR drift measurement	E.2.9	5	R	1.73	1	1	2.9	2.9	∞
SAR Scaling	E.6.5	0	R	1.73	1	1	0.0	0.0	∞
Phantom & Tissue Parameters									
Phantom Uncertainty (Shape & Thickness tolerances)	E.3.1	7.6	R	1.73	1.0	1.0	4.4	4.4	∞
Liquid Conductivity - measurement uncertainty	E.3.3	4.3	N	1	0.78	0.71	3.3	3.0	76
Liquid Permittivity - measurement uncertainty	E.3.3	4.2	N	1	0.23	0.26	1.0	1.1	75
Liquid Conductivity - Temperature Uncertainty	E.3.4	3.4	R	1.73	0.78	0.71	1.5	1.4	∞
Liquid Permittivity - Temperature Uncertainty	E.3.4	0.6	R	1.73	0.23	0.26	0.1	0.1	∞
Liquid Conductivity - deviation from target values	E.3.2	5.0	R	1.73	0.64	0.43	1.8	1.2	∞
Liquid Permittivity - deviation from target values	E.3.2	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

FCC ID: C3K2076	SAR EVALUATION REPORT		Approved by: Technical Manager
Document S/N: 1M2312190129-01.C3K	DUT Type: Portable Computing Device		Page 35 of 40

Applicable for SAR measurements > 6GHz:

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	E.2.1	9.3	N	1	1	1	9.3	9.3	∞
Axial Isotropy	E.2.2	0.25	N	1	0.7	0.7	0.2	0.2	∞
Hemishperical Isotropy	E.2.2	1.3	N	1	0.7	0.7	0.9	0.9	∞
Boundary Effect	E.2.3	2	R	1.73	1	1	1.2	1.2	∞
Linearity	E.2.4	0.3	N	1	1	1	0.3	0.3	∞
System Detection Limits	E.2.4	0.25	R	1.73	1	1	0.1	0.1	∞
Modulation Response	E.2.5	4.8	R	1.73	1	1	2.8	2.8	∞
Readout Electronics	E.2.6	0.3	N	1	1	1	0.3	0.3	∞
Response Time	E.2.7	0.8	R	1.73	1	1	0.5	0.5	∞
Integration Time	E.2.8	2.6	R	1.73	1	1	1.5	1.5	∞
RF Ambient Conditions - Noise	E.6.1	3	R	1.73	1	1	1.7	1.7	∞
RF Ambient Conditions - Reflections	E.6.1	3	R	1.73	1	1	1.7	1.7	∞
Probe Positioner Mechanical Tolerance	E.6.2	0.8	R	1.73	1	1	0.5	0.5	∞
Probe Positioning w/ respect to Phantom	E.6.3	6.7	R	1.73	1	1	3.9	3.9	∞
Extrapolation, Interpolation & Integration algorithms for Max. SAR Evaluation	E.5	4	R	1.73	1	1	2.3	2.3	∞
Test Sample Related									
Test Sample Positioning	E.4.2	3.12	N	1	1	1	3.1	3.1	35
Device Holder Uncertainty	E.4.1	1.67	N	1	1	1	1.7	1.7	5
Output Power Variation - SAR drift measurement	E.2.9	5	R	1.73	1	1	2.9	2.9	∞
SAR Scaling	E.6.5	0	R	1.73	1	1	0.0	0.0	∞
Phantom & Tissue Parameters									
Phantom Uncertainty (Shape & Thickness tolerances)	E.3.1	7.6	R	1.73	1.0	1.0	4.4	4.4	∞
Liquid Conductivity - measurement uncertainty	E.3.3	4.3	N	1	0.78	0.71	3.3	3.0	76
Liquid Permittivity - measurement uncertainty	E.3.3	4.2	N	1	0.23	0.26	1.0	1.1	75
Liquid Conductivity - Temperature Uncertainty	E.3.4	3.4	R	1.73	0.78	0.71	1.5	1.4	∞
Liquid Permittivity - Temperature Uncertainty	E.3.4	0.6	R	1.73	0.23	0.26	0.1	0.1	∞
Liquid Conductivity - deviation from target values	E.3.2	5.0	R	1.73	0.64	0.43	1.8	1.2	∞
Liquid Permittivity - deviation from target values	E.3.2	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

FCC ID: C3K2076	SAR EVALUATION REPORT	Approved by: Technical Manager
Document S/N: 1M2312190129-01.C3K	DUT Type: Portable Computing Device	Page 36 of 40

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

FCC ID: C3K2076	SAR EVALUATION REPORT	Approved by: Technical Manager
Document S/N: 1M2312190129-01.C3K	DUT Type: Portable Computing Device	Page 37 of 40

13 CONCLUSION

13.1 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]

FCC ID: C3K2076	SAR EVALUATION REPORT	Approved by: Technical Manager
Document S/N: 1M2312190129-01.C3K	DUT Type: Portable Computing Device	Page 38 of 40

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FCC ID: C3K2076	SAR EVALUATION REPORT	Approved by: Technical Manager
Document S/N: 1M2312190129-01.C3K	DUT Type: Portable Computing Device	Page 39 of 40

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FCC ID: C3K2076	SAR EVALUATION REPORT	Approved by: Technical Manager
Document S/N: 1M2312190129-01.C3K	DUT Type: Portable Computing Device	Page 40 of 40