

SAR Test Report - New Application

Applicant:



Garmin International Inc.
1200 East 151 St.
Olathe, KS, 66062
USA

FCC ID:

IPH-04394

Product Model Number / HVIN

A04394

Maximum reported SAR

Body (1g):	0.80	W/kg
General Pop. Limit:	1.60	

Maximum reported SAR

Extremity (10g):	0.35	W/kg
General Pop. Limit:	4.00	

IC Registration Number

Product Name / PMN

A04394

In Accordance With:

FCC 47 CFR §2.1093

Radiofrequency Radiation Exposure Evaluation: Portable Devices

Approved By:



Ben Hewson, President
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Canada



Test Lab Certificate: 2470.01



Industry
Canada

IC Registration 3874A



FCC Registration: CA3874

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1.0 REVISION HISTORY

Revision History				
Samples Tested By:		Ben Hewson		Date(s) of Evaluation: 14-15 September 2022
Report Prepared By:		Art Voss		Report Reviewed By: Art Voss
Report Revision	Description of Revision	Revised Section	Revised By	Revision Date
0.1	Draft	n/a	Art Voss	21 October 2022
1.0	Initial Release	n/a	Ben Hewson	31 October 2022
2.0	Revised for Extremity Evaluation	10, 11	Art Voss	19 December 2022

2.0 CLIENT AND DEVICE INFORMATION

Client Information	
Applicant Name	Garmin International Inc.
Applicant Address	1200 East 151 St
	Olathe, KS, 66062
	USA
DUT Information	
Device Identifier(s):	FCC ID: IPH-04394
	ISED ID:
Device Model(s) / HVIN:	A04394
Device Marketing Name / PMN:	A04394
Test Sample Serial No.:	Conducted: 3401137001 OTA: 3403386857
Device Type:	Low Power Digital Device Transmitter
FCC Equipment Class:	Digital Transmission System (DTS), Part 15 Spread Spectrum Transmitter (DSS), Unlicensed National Information Infrastructure TX (NII)
Transmit Frequency Range:	WiFi (DTS): 2412-2462MHz
	BT/BLE (DTS, DSS): 2402-2480MHz
Manuf. Max. Rated Output Power:	BT LE (DXX): 2mW (3dBm)
	ANT (DXX): 2mW (3dBm)
	802.11 (DTS): 54mW (17.32dBm)
Modulation:	WiFi: DSSS, OFDM, CCK, MCS0-7
Modulation:	BLE: GMSK
Modulation:	ANT: GFSK:
DUT Power Source:	4.35 VDC Internal Li-Ion Battery
DUT Dimensions [LxWxH]	L x W x H: 80mm x 60mm x 20mm
Deviation(s) from standard/procedure:	None
Modification of DUT:	None

3.0 SCOPE OF EVALUATION

This Certification Report was prepared on behalf of:
Garmin International Inc.

The A04394 is a Low Power Digital Transmitter that may be mounted or handheld, with a Wi-Fi transceiver that is capable of operating in the 2.4GHz WiFi/ BT and 5GHz U-NII frequency bands. The device is capable of operating simultaneously on the BT and U-NII bands. The device is intended for General Population Use. The product operates from an internal proprietary Li-ion rechargeable battery which can be connected to a compliant USB interface port, AC or DC adapter for charging. Test samples provided by the manufacturer were capable of transmitting at select frequencies and modulations preset by the manufacturer. An additional antenna modification was prepared for one sample allowing the ability to connect test equipment for antenna port conducted power analysis.

Application:

This is an application for a new device certification.

Scope:

The scope of this evaluation limited to the evaluation of SAR for intended and non-intended applications. It will include evaluation of the 2.4 GHz WiFi/BT and U-NII transmitters for all required RF exposure configurations including Extremity and Body Configuration as the device may be operational while in hand or on person (lap).

The Test Plan developed for this evaluation is based on the required test channels and configurations which produced the highest worst case SAR and where applicable, SAR test reduction and/or SAR test exclusion may be utilized. The DUT was evaluated for SAR at the maximum tune up tolerance and conducted output power level, preset by the manufacturer and in accordance with the procedures described in IEC/IEEE 62209-1528, FCC KDB 447498 and FCC KDB 248227.

4.0 NORMATIVE REFERENCES

Normative References*	
ANSI / ISO 17025:2005	General Requirements for competence of testing and calibration laboratories
FCC CFR Title 47 Part 2 Title 47: Part 2.1093:	Code of Federal Regulations Telecommunication Radiofrequency Radiation Exposure Evaluation: Portable Devices
IEEE International Committee on Electromagnetic Safety IEEE 1528-2013:	IEEE Recommended Practice for Determining the Peak Spatial-Average Specific Absorption Rate (SAR) in the Human Head from Wireless Communications Devices: Measurement Techniques
IEC International Standard IEC 62209-2 2010	Human exposure to radio frequency fields from hand-held and body-mounted wireless communication devices - Part 2
IEC International Standard /IEEE International Committee on Electromagnetic Safety IEC/IEEE 62209-1528	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 1528; Human models, instrumentation, and procedures (Frequency range of 4 MHz to 10 GHz)
FCC KDB KDB 865664 D01v01r04	SAR Measurement Requirements for 100MHz to 6GHz
FCC KDB KDB 447498 D01v06	Mobile and Portable Devices RF Exposure Procedures and Equipment Authorization Policies
FCC KDB KDB 248227 D01v02r02	SAR Guidance for IEEE 802.11 (WiFi) Transmitters
* When the issue number or issue date is omitted, the latest version is assumed.	

5.0 STATEMENT OF COMPLIANCE

This measurement report demonstrates that samples of the product model(s) were evaluated for Specific Absorption Rate (SAR) on the date(s) shown, in accordance with the Measurement Procedures cited and were found to comply with the Standard(s) Applied based on the Exposure Limits of the Use Group indicated for which the product is intended to be used.

Applicant:	Model / HVIN:	
Garmin International Inc.	A04394	
Standard(s) Applied:	Measurement Procedure(s):	
FCC 47 CFR §2.1093	FCC KDB 865664, FCC KDB 447498, FCC KDB 248227 IEC/IEEE Standard 62209-1528, IEC 62209-2	
Reason For Issue:	Use Group:	Limits Applied:
☒ New Certification ☐ Class I Permissive Change ☐ Class II Permissive Change	☒ General Population / Uncontrolled ☐ Occupational / Controlled	☒ 1.6W/kg - 1g Volume ☐ 8.0W/kg - 1g Volume ☒ 4.0W/kg - 10g Volume
Reason for Change:		Date(s) Evaluated:
		14 - 15 September 2022

The results of this investigation are based solely on the test sample(s) provided by the applicant which was not adjusted, modified or altered in any manner whatsoever except as required to carry out specific tests or measurements. A description of the device, operating configuration, detailed summary of the test results, methodologies and procedures used during this evaluation, the equipment used and the various provisions of the rules are included in this test report.

I attest that the data reported herein is true and accurate within the tolerance of the Measurement Instrument Uncertainty; that all tests and measurements were performed in accordance with accepted practices or procedures; and that all tests and measurements were performed by me or by trained personnel under my direct supervision. The results of this investigation are based solely on the test sample(s) provided by the client which were not adjusted, modified or altered in any manner whatsoever, except as required to carry out specific tests or measurements. This test report has been completed in accordance with ISO/IEC 17025.


 Art Voss, P.Eng.
 Technical Manager
 Celltech Labs Inc.
 21 October 2022
 Date



6.0 SAR MEASUREMENT SYSTEM

SAR Measurement System

Celltech Labs Inc. SAR measurement facility employs a Dosimetric Assessment System (DASY™) manufactured by Schmid & Partner Engineering AG (SPEAG™) of Zurich, Switzerland. The DASY6 measurement system is comprised of the measurement server, a robot controller, a computer, a near-field probe, a probe alignment sensor, an Elliptical Planar Phantom (ELI) phantom and a specific anthropomorphic mannequin (SAM) phantom for Head and/or Body SAR evaluations. The robot is a six-axis industrial robot performing precise movements to position the probe to the location (points) of maximum electromagnetic field (EMF). A cell controller system contains the power supply, robot controller and a teach pendant (Joystick) to control the robot's servo motors. The Staubli robot is connected to the cell controller to allow software manipulation of the robot. A data acquisition electronic (DAE) circuit performs the signal amplification, signal multiplexing, AD-conversion, offset measurements, mechanical surface detection, collision detection, etc. is connected to the Electro-optical coupler (EOC). The EOC performs the conversion from the optical form the DAE to digital electronic signal and transfers data to the DASY6 measurement server. The DAE4 utilizes a highly sensitive electrometer-grade preamplifier with auto-zeroing, a channel and gain-switching multiplexer, a fast 16-bit AD-converter, a command decoder and a control logic unit. Transmission to the DASY6 measurement server is accomplished through an optical downlink for data and status information and an optical uplink for commands and clock lines. The mechanical probe-mounting device includes two different sensor systems for frontal and sidewise probe contacts. The sensor systems are also used for mechanical surface detection and probe collision detection. The robot utilizes a controller with built in VME-bus computer.



DASY 6 SAR System



DASY 6 Measurement Controller

7.0 RF CONDUCTED POWER MEASUREMENT

Table 7.1 Conducted Power Measurements, WiFi/BT

Conducted Power Measurements													
Band	Mode	Bandwidth (MHz)	Channel	Frequency (MHz)	Modulation	Bit Rate (Mbps)	Measured Power (dBm)	Rated Power (dBm)	Rated Power (W)	Delta (dB)	SAR Test Channel (Y/-)	Duty Cycle (%)	Crest Factor (1/DC)
WLAN 2.4G	802.11b	20	6	2437	CCK	1	16.34	17.32	0.054	-0.98	-	-	-
			6	2437	CCK	2	16.52	17.32	0.054	-0.80	-	-	-
			6	2437	DSSS	5.5	16.86	17.32	0.054	-0.46	-	-	-
			6	2437		11	16.85	17.32	0.054	-0.47	-	-	-
			1	2412		5.5	12.74	17.32	0.054	-4.58	Y	89.3	1.12
			2	2417			14.84	17.32	0.054	-2.48	-	-	-
			3	2422			15.71	17.32	0.054	-1.61	-	-	-
			4	2427			16.71	17.32	0.054	-0.61	-	-	-
			5	2432			16.89	17.32	0.054	-0.43	-	-	-
			6	2437			16.84	17.32	0.054	-0.48	Y	89.3	1.12
			7	2442			17.04	17.32	0.054	-0.28	Y	89.3	1.12
			8	2447			16.90	17.32	0.054	-0.42	-	-	-
			9	2452			16.18	17.32	0.054	-1.14	-	-	-
			10	2457			14.40	17.32	0.054	-2.92	-	-	-
			11	2462			16.90	17.32	0.054	-0.42	Y	89.3	1.12
WLAN 2.4G	802.11g	20	6	2437	OFDM	6	15.07	17.32	0.054	-2.25	-	-	-
						9	14.99	17.32	0.054	-2.33	-	-	-
						12	14.97	17.32	0.054	-2.35	-	-	-
						36	13.58	17.32	0.054	-3.74	-	-	-
						54	12.87	17.32	0.054	-4.45	-	-	-
			1	2412		6	9.93	17.32	0.054	-7.39	-	-	-
			2	2417			10.44	17.32	0.054	-6.88	-	-	-
			3	2422			14.49	17.32	0.054	-2.83	-	-	-
			4	2427			14.44	17.32	0.054	-2.88	-	-	-
			5	2432			14.44	17.32	0.054	-2.88	-	-	-
			6	2437			15.07	17.32	0.054	-2.25	-	-	-
			7	2442			14.78	17.32	0.054	-2.54	-	-	-
			8	2447			13.34	17.32	0.054	-3.98	-	-	-
			9	2452			11.54	17.32	0.054	-5.78	-	-	-
			10	2457			7.26	17.32	0.054	-10.06	-	-	-
			11	2462			7.26	17.32	0.054	-10.06	-	-	-

Table 7.1 Conducted Power Measurements, WiFi/BT (Cont.)

Conducted Power Measurements													
Band	Mode	Bandwidth	Channel	Frequency	Modulation	Bit Rate	Measured Power	Rated Power	Rated Power	Delta	SAR Test Channel	Duty Cycle	Crest Factor
		(MHz)		(MHz)		(Mbps)	(dBm)	(dBm)	(W)	(dB)	(Y/-)	(%)	(1/DC)
WLAN 2.4G	802.11n	20	6	2437	MCS0	-	14.45	16.72	0.047	-2.27	-	-	-
					MCS3		13.91	16.72	0.047	-2.81	-	-	-
					MCS7		10.18	16.72	0.047	-6.54	-	-	-
			1	2412	MCS0		7.77	16.72	0.047	-8.95	-	-	-
			2	2417			10.20	16.72	0.047	-6.52	-	-	-
			3	2422			11.57	16.72	0.047	-5.15	-	-	-
			4	2427			11.56	16.72	0.047	-5.16	-	-	-
			5	2432			13.35	16.72	0.047	-3.37	-	-	-
			6	2437			14.45	16.72	0.047	-2.27	-	-	-
			7	2442			14.42	16.72	0.047	-2.30	-	-	-
			8	2447			13.35	16.72	0.047	-3.37	-	-	-
			9	2452			12.43	16.72	0.047	-4.29	-	-	-
			10	2457			11.58	16.72	0.047	-5.14	-	-	-
			11	2462			8.87	16.72	0.047	-7.85	-	-	-
BT	LE	1	2	2402	GMSK	-	3.00	3.00	0.002	0.00	Y	100	1
			17	2440			3.00	3.00	0.002	0.00	-	-	-
			39	2480			-0.08	3.00	0.002	-3.08	-	-	-
ANT	ANT	1	2	2402	GFSK	-	-1.35	3.00	0.002	-4.35	-	-	-
			41	2441			2.21	3.00	0.002	-0.79	-	-	-
			80	2480			-1.19	3.00	0.002	-4.19	-	-	-

The rated power and tolerance are stated for typical transmission modes and data rates. Some modes and data rates may produce lower than rated conducted power levels. Power measurements taken across the various channels, modes and data rates did not produce levels in excess of the Rated Power plus Tolerance. SAR was evaluated using the power level setting specified by the manufacture to be the max output power and produce the most conservative SAR. SAR was evaluated at the maximum average tune up tolerance. See section 2.0 Client and Device Information for details. The reported SAR was not scaled down.

8.0 NUMBER OF TEST CHANNELS (N_c)

Table 8.1 Number of Test Channels

The intended use of the device is to be mounted on a vehicle's dashboard; however, the device could transmit while held in hand or on person. As such the device was evaluated for both Body and Extremity use.

Wi-Fi SAR Evaluation:

SAR was evaluated in DSSS mode at the maximum duty cycle. The power level setting selected was specified by the manufacturer to be the max output power and produce the most conservative SAR.

As per FCC KDB 248227, the required 802.11 test channels are Ch1, Ch 6 and Ch 11; The highest conducted output power was found on Channel 7. As a result, this channel was selected for initial SAR evaluation.

SAR test reduction methodology was applied to reduce the total number of required test channels from the SAR test evaluation.

When applicable, SAR test reduction methods may be utilized.

802.11b DSSS SAR test reduction is determined according to the following:

- When the reported SAR of the highest measured maximum output power channel is ≤ 0.8 W/kg, no further SAR testing is required for 802.11b DSSS in that exposure configuration.
- When the reported SAR is > 0.8 W/kg, SAR is required for that exposure configuration using the next highest output power channel. When any reported SAR is > 1.2 W/kg, SAR is required for the third channel.

2.4 GHz 802.11g/n OFDM SAR Test Exclusion Requirements

- When KDB Publication 447498 SAR test exclusion applies to the OFDM configuration.
- When the highest reported SAR for DSSS is adjusted by the ratio of OFDM to DSSS specified maximum output power and the adjusted SAR is ≤ 1.2 W/kg.

The initial test configuration for 2.4 GHz and 5 GHz OFDM transmission modes is determined by the 802.11 configuration with the highest maximum output power specified for production units, including tune-up tolerance, in each standalone and aggregated frequency band. An initial test position was established for Both UNII1 and UNII 3 bands.

When the reported SAR of the initial test configuration is > 0.8 W/kg, SAR measurement is required for subsequent next highest measured output power channel(s) in the initial test configuration until reported SAR is ≤ 1.2 W/kg or all required channels are tested.

NOTE: The Bluetooth transmitter is capable of simultaneous transmission with the 5GHz WiFi Transmitter. The Bluetooth SAR was evaluated for simultaneous SAR.

As per KDB 447498 D01V06, where appropriate SAR test exclusion based on antenna test separation distances may be applied.

1. When the distance is < 50mm exclusion threshold is "Ratio" , when the distance is >50 mm exclusion is in "mW"
2. Maximum power is the source-based-time-average power and represents the maximum RF output power among production units.
3. Per KDB 447498 D01v06, for larger devices, the test separation distance of adjacent edge configuration is determined by the closest separation between the antenna and the user
4. Per KDB 447498 D01v06, standalone SAR test exclusion threshold is applied; If the test separation distance is < 5mm, 5mm is used to determine SAR exclusion threshold
5. Per KDB 447498 D01v06, the 1-g and 10-g SAR test exclusion thresholds for 100 MHz to 6 GHz at test separation distances ≤ 50mm are determined by; (step a)

$$[(\text{max. power of channel, including tune-up tolerance, mW}) / (\text{min. test separation distance, mm})] * [\sqrt{f(\text{GHz})}] \leq 3.0 \text{ for 1-g SAR and } \leq 7.5 \text{ for 10-g extremity SAR}$$
 - f(GHz) is the f channel transmit frequency in GHz
 - power and distance are rounded to the nearest MW and mm before calculation
 - result is rounded to one decimal place for comparison
 - the values 3.0 and 7.5 are referred to as numeric thresholds in step b
6. Per KDB 447498 D01v06, at 100 MHz to 6 GHz and for test separation distance > 50mm, the SAR test exclusion threshold is determined according to the following; (step b)
 - a) [Power allowed at numeric threshold for 50 mm in step a) + test separation distance - 50mm)*(f(MHz)/150)] mW, at 100 MHz to 1500 MHz
 - b) [Power allowed at numeric threshold for 50 mm in step a) + (test separation distance -50mm)* 10] mW at > 1500MHz and ≤ 6GHz

9.0 ACCESSORIES EVALUATED

Table 9.1 Manufacturer's Accessory List

There are no manufacturer's accessories available when used in a portable application.

10.0 SAR MEASUREMENT SUMMARY

Table 10.1: Measured Results – BODY

Measured 1g SAR Results - BODY Configuration															
Date	Plot ID	Test Frequency (MHz)	DUT Configuration					Accessories				DUT Spacing		Measured SAR (W/kg)	SAR Drift (dB)
			Pos	Mode	BW	Mod	BR	Antenna ID	Battery ID	Body ID	Audio ID	DUT (mm)	Antenna (mm)		
14 Sep 2022	B1	2442	Front Side	802.11B	20MHz	DSSS	5.5mbps	n/a	n/a	n/a	n/a	0	0	0.496	0.130
14 Sep 2022	B3	2442	Right Edge	802.11B	20MHz	DSSS	5.5mbps	n/a	n/a	n/a	n/a	0	0	0.084	0.610
14 Sep 2022	B4	2442	Left Edge	802.11B	20MHz	DSSS	5.5mbps	n/a	n/a	n/a	n/a	0	0	0.305	0.450
15 Sep 2022	B5	2442	Top Edge	802.11B	20MHz	DSSS	5.5mbps	n/a	n/a	n/a	n/a	0	0	0.619	-0.130
15 Sep 2022	B6	2442	Bottom Edge	802.11B	20MHz	DSSS	5.5mbps	n/a	n/a	n/a	n/a	0	0	0.077	0.300
15 Sep 2022	B7	2442	Back Side	802.11B	20MHz	DSSS	5.5mbps	n/a	n/a	n/a	n/a	0	0	0.537	-0.060
15 Sep 2022	B8	2402	Top Edge	BLE	2MHz	GMSK	2mbps	n/a	n/a	n/a	n/a	0	0	0.002	1.830
15 Sep 2022	B9	2402	Back Side	BLE	2MHz	GMSK	2mbps	n/a	n/a	n/a	n/a	0	0	0.004	1.210
15 Sep 2022	B10	2442	Back Side	802.11B	20MHz	DSSS	5.5mbps	n/a	n/a	n/a	n/a	0	0	0.681	-0.420
Applicable SAR Limit								Use Group						Limit	
FCC CFR 2.1093			Health Canada Safety Code 6					General Population/User Unaware						1.6 W/kg	

Table 10.2: Measured Results – Extremity

Measured 10g SAR Results - EXTREMITY Configuration															
Date	Plot ID	Test Frequency (MHz)	DUT Configuration					Accessories				DUT Spacing		Measured SAR (W/kg)	SAR Drift (dB)
			Pos	Mode	BW	Mod	BR	Antenna ID	Battery ID	Body ID	Audio ID	DUT (mm)	Antenna (mm)		
14 Sep 2022	E1	2442	Front Side	802.11B	20MHz	DSSS	5.5mbps	n/a	n/a	n/a	n/a	0	0	0.216	0.130
14 Sep 2022	E3	2442	Right Edge	802.11B	20MHz	DSSS	5.5mbps	n/a	n/a	n/a	n/a	0	0	0.042	0.610
14 Sep 2022	E4	2442	Left Edge	802.11B	20MHz	DSSS	5.5mbps	n/a	n/a	n/a	n/a	0	0	0.136	0.450
15 Sep 2022	E5	2442	Top Edge	802.11B	20MHz	DSSS	5.5mbps	n/a	n/a	n/a	n/a	0	0	0.277	-0.130
15 Sep 2022	E6	2442	Bottom Edge	802.11B	20MHz	DSSS	5.5mbps	n/a	n/a	n/a	n/a	0	0	0.037	0.300
15 Sep 2022	E7	2442	Back Side	802.11B	20MHz	DSSS	5.5mbps	n/a	n/a	n/a	n/a	0	0	0.254	-0.060
15 Sep 2022	E8	2402	Top Edge	BLE	2MHz	GMSK	2mbps	n/a	n/a	n/a	n/a	0	0	0.000	1.830
15 Sep 2022	E9	2402	Back Side	BLE	2MHz	GMSK	2mbps	n/a	n/a	n/a	n/a	0	0	0.001	1.210
15 Sep 2022	E10	2442	Back Side	802.11B	20MHz	DSSS	5.5mbps	n/a	n/a	n/a	n/a	0	0	0.299	-0.420
Applicable SAR Limit								Use Group						Limit	
FCC CFR 2.1093			Health Canada Safety Code 6					General Population/User Unaware						4 W/kg	

11.0 SCALING OF MAXIMUM MEASURE SAR

Table 11.1 SAR Scaling 1g

Scaling of Maximum Measured SAR (1g)				
Measured Parameters		Configuration		
		Body		
Plot ID		B10		
Maximum Measured SAR _M		0.681		(W/kg)
Frequency		2442		(MHz)
Drift	Power Drift	-0.420		(dB)
Conducted Power		17.040		(dBm)
DC	Transmit Duty Cycle	100.000		(%)
Fluid Deviation from Target				
Δe	Permittivity	-6.84%		
Δσ	Conductivity	6.25%		

Fluid Sensitivity Calculation (1g)			IEC/IEEE 62209-1528 7.8.2	
Delta SAR = Ce * Δe + Cσ * Δσ			(8)	
Ce = (-0.0007854*f ³) + (0.009402*f ²) - (0.02742*f) - 0.2026			(9)	
Cσ = (0.009804*f ³) - (0.08661*f ²) + (0.02981*f) + 0.7829			(10)	
f	Frequency (GHz)	2.442		
Ce		-0.225		
Cσ		0.482		
Ce * Δe		0.015		
Cσ * Δσ		0.030		
ΔSAR		0.046 (3)		(%)

Note(3): Delta SAR is Positive, SAR Adjustment for Fluid Sensitivity is not Required, in accordance with ISED Notice 2012-DRS0529

Manufacturer's Tuneup Tolerance				
Measured Conducted Power	17.040			(dBm)
Rated Conducted Power	17.320			(dBm)
ΔP	-0.280			(dB)

Crest Factor				
Transmit Duty Cycle (DC)	100.000			(%)
CF (1/DC)	1.000 (5)			

Note(5): Crest Factor = 1 (100% Duty Cycle), Crest Factor Adjustment not Required.

Table 11.1 SAR Scaling 1g (Cont.)

Scaling of Maximum Measured SAR (1g)				
Measured Parameters	Configuration			
	Body			
Plot ID	B10			
Maximum Measured SAR _M	0.681			(W/kg)
Frequency	2442			(MHz)
SAR Adjustment for Fluid Sensitivity				
SAR ₁ = SAR _M X [ΔSAR]	0.681			(W/kg)
SAR Adjustment for Tuneup Tolerance				
SAR ₂ = SAR ₁ + [ΔP]	0.726			(W/kg)
SAR Adjustment for Drift				
SAR ₃ = SAR ₂ + [Drift]	0.800			(W/kg)
SAR Adjustment for Crest Factor				
SAR ₄ = SAR ₃ x [CF]	0.800			(W/kg)
<u>reported</u> 1g SAR				
SAR ₄	0.80			(W/kg)

Table 11.2 SAR Scaling 10g

Scaling of Maximum Measured SAR (10g)				
Measured Parameters		Configuration		
		Extremity		
Plot ID		E10		
Maximum Measured SAR _M		0.299		(W/kg)
Frequency		2442		(MHz)
Drift	Power Drift	-0.420		(dB)
	Conducted Power	17.040		(dBm)
DC	Transmit Duty Cycle	100.000		(%)
Fluid Deviation from Target				
Δe	Permittivity	-6.84%		
Δσ	Conductivity	6.25%		

Fluid Sensitivity Calculation (10g)			IEC/IEEE 62209-1528 7.8.2	
Delta SAR = Ce * Δe + Cσ * Δσ			(8)	
Ce = (0.003456*f ³) - (0.03531*f ²) + (0.07675*f) - 0.186			(11)	
Cσ = (0.004479*f ³) - (0.01586*f ²) - (0.1972*f) + 0.7717			(12)	
f	Frequency (GHz)	2.442		
	Ce	-0.225		
	Cσ	0.482		
	Ce * Δe	0.015		
	Cσ * Δσ	0.030		
	ΔSAR	0.046 (3)		(%)

Note(3): Delta SAR is Positive, SAR Adjustment for Fluid Sensitivity is not Required, in accordance with ISED Notice 2012-DRS0529

Manufacturer's Tuneup Tolerance				
Measured Conducted Power	17.040			(dBm)
Rated Conducted Power	17.320			(dBm)
ΔP	-0.280			(dB)

Crest Factor				
Transmit Duty Cycle (DC)	100.000			(%)
CF (1/DC)	1.000 (5)			

Note(5): Crest Factor = 1 (100% Duty Cycle), Crest Factor Adjustment not Required.

Table 11.2 SAR Scaling 10g (Cont.)

Scaling of Maximum Measured SAR (10g)				
Measured Parameters	Configuration			
	Extremity			
Plot ID	E10			
Maximum Measured SAR _M	0.299			(W/kg)
Frequency	2442			(MHz)
SAR Adjustment for Fluid Sensitivity				
SAR ₁ = SAR _M X [ΔSAR]	0.299			(W/kg)
SAR Adjustment for Tuneup Tolerance				
SAR ₂ = SAR ₁ + [ΔP]	0.319			(W/kg)
SAR Adjustment for Drift				
SAR ₃ = SAR ₂ + [Drift]	0.351			(W/kg)
SAR Adjustment for Crest Factor				
SAR ₄ = SAR ₃ x [CF]	0.351			(W/kg)
<u>reported</u> 10g SAR				
SAR ₄	0.35			(W/kg)

NOTES to Table	
Scaling of the Maximum Measured SAR is based on the highest Face, Body and/or Head SAR measured of ALL test channels, configurations and accessories used during THIS evaluation. The Measured Fluid Deviation parameters apply only to deviation of the tissue equivalent fluids used at the frequencies which produced the highest measured SAR. The Measured Conducted Power applies to the Conducted Power measured at the frequencies producing the highest Face, Body and/or Head SAR. The Measured Drift is the SAR drift associated with that specific SAR measurement. The Reported SAR is the accumulation of all SAR Adjustments from the applicable Steps 1 through 4. The Plot ID is for identification of the SAR Measurement Plots in the Annexes of this report. NOTE: Some of the scaling factors in Steps 1 through 4 may not apply and are identified by grayed fields.	
Step 1	Per IEC/IEEE 62209-1528, FCC KDB 865664, ISSED RSS-102 and ISSED Notice 2012-DRS0529. Scaling required only when Measured Fluid Deviation is greater than 5%. If the Measured Fluid Deviation is greater than 5%, Table 10.1 will be shown and will indicate the SAR scaling factor in percent (%). SAR is MULTIPLIED by this scaling factor only when the scaling factor is positive (+).
Step 2	Per IEC/IEEE 62209-1528, FCC KDB 865664 and ISSED RSS-102. Scaling required only when the difference (Delta) between the Measured Conducted Power and the Manufacturer's Rated Conducted Power is (-) Negative. The absolute value of Delta is ADDED to the SAR.
Step 3	Per IEC/IEEE 62209-1528, FCC KDB 865664 and ISSED RSS-102. Scaling required only when Measured Drift is (-) Negative. The absolute value of Measured Drift is added to Reported.
Step 4	Per IEC/IEEE 62209-1528, FCC KDB 865664 and ISSED RSS-102. When the transmit Duty Cycle (DC) is less than 100%, the <u>reported</u> SAR must be scaled to 100% by the Crest Factor (CF). CF = 1/DC where DC is in decimal.
Step 5	The Reported SAR is the Maximum Final Adjusted SAR from the applicable Steps 1 through 4 and are reported on Page 1 of this report.

11.3 Simultaneous Transmission SAR Analysis

There are no simultaneous transmission conditions.

12.0 SAR EXPOSURE LIMITS

Table 12.1 Exposure Limits

SAR RF EXPOSURE LIMITS			
FCC 47 CFR§2.1093	Health Canada Safety Code 6	General Population / Uncontrolled Exposure ⁽⁴⁾	Occupational / Controlled Exposure ⁽⁵⁾
Spatial Average ⁽¹⁾ (averaged over the whole body)		0.08 W/kg	0.4 W/kg
Spatial Peak ⁽²⁾ (Head and Trunk averaged over any 1 g of tissue)		1.6 W/kg	8.0 W/kg
Spatial Peak ⁽³⁾ (Hands/Wrists/Feet/Ankles averaged over 10 g)		4.0 W/kg	20.0 W/kg
(1) The Spatial Average value of the SAR averaged over the whole body.			
(2) 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.			
(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.			
(4) Uncontrolled environments are defined as locations where there is potential exposure to individuals who have no knowledge or control of their potential exposure.			
(5) Controlled environments are defined as locations where there is potential exposure to individuals who have knowledge of their potential exposure and can exercise control over their exposure.			

13.0 DETAILS OF SAR EVALUATION

13.1 Day Log

DAY LOG					Fluid Dielectric	SPC	Test	Task
Date	Ambient Temp (°C)	Fluid Temp (°C)	Relative Humidity (%)	Barometric Pressure (kPa)				
14 Sep 2022	25.2	23.8	19%	100.6	X	X	X	2450H Fluid, SPC, SAR Testing
15 Sep 2022	23.6	23.5	20%	101.5			X	2450H SAR Testing

13.2 DUT Setup and Configuration

DUT Setup and Configuration	
Overview	The A04394 was evaluated for Body SAR at the maximum conducted output power level, preset by the manufacturer, with a fully charged battery in unmodulated continuous transmit operation (Maximum duty cycle), as provided by the manufacturer with a unit set up and pre-installed with Compliance Test Mode.

13.3 DUT Positioning

DUT Positioning	
Positioning	The DUT Positioner was securely fastened to the Phantom Platform to ensure consistent positioning of the DUT for each test evaluation.
FACE Configuration	This device is not capable of voice communication and was not tested in the FACE configuration.
BODY Configuration	There are no Body-Worn and Audio Accessories for this device and was not evaluated for BODY configuration.
HEAD Configuration	This device is not intended to be held to the ear and was not tested in the HEAD configuration.
EXTREMITY Configuration	The DUT, was securely clamped into the device holder with the surface of the DUT normally in contact with the body (hand) in direct contact with the bottom of the phantom, or 0mm separation from the DUT to the phantom resembling that for which it was intended to be used.

13.4 General Procedures and Report

General Procedures and Reporting	
General Procedures	The fluid dielectric parameters of the Active Tissue Simulating Liquid (TSL) were measured as described in this Section, recorded and entered into the DASY Measurement Server. Active meaning the TSL used during the SAR evaluation of the DUT. The temperature of the Active TSL was measured and recorded prior to performing a System Performance Check (SPC). An SPC was performed with the Active TSL prior to the start of the test series. The temperature of the Active TSL was measured throughout the day and the Active TSL temperature was maintained to $\pm 0.5^{\circ}\text{C}$. The Active TSL temperature was maintained to within $\pm 2.0^{\circ}\text{C}$ throughout the test series. The liquid parameters shall be measured within 24 hours before the start of a test series and if it takes longer than 48 hours, the liquid parameters shall also be measured at the end of the test series. An Area Scan exceeding the length and width of the DUT projection was performed and the locations of all maximas within 2dB of the Peak SAR recorded. A Zoom Scan centered over the Peak SAR location(s) was performed and the 1g and 10g SAR values recorded. The resolutions of the Area Scan and Zoom Scan are described in the Scan Resolution table(s) in this Section. A Power Reference Measurement was taken at the phantom reference point immediately prior to the Area Scan. A Power Drift measurement was taken at the phantom reference point immediately following the Zoom Scan to determine the power drift. A Z-Scan from the <u>Maximum Distance to Phantom Surface</u> to the fluid surface was performed following the power drift measurement.
Reporting	The 1g SAR, 10g SAR and power drift measurements are recorded in the SAR Measurement Summary tables in the SAR Measurement Summary Section of this report. The SAR values shown in the SAR column are the SAR values reported by the SAR Measurement Server with the DUT operating at maximum transmit duty cycle. These tables also include other information such as transmit channel and frequency, modulation, accessories tested and DUT-phantom separation distance. In the Scaling of Maximum Measured SAR Section of this report, the highest measured SAR in the BODY configuration, within the entire scope of this assessment, are, when applicable, scaled for Fluid Sensitivity, Manufacturer's Tune-Up Tolerance, Simultaneous Transmission and Drift. With the exception of Duty Cycle correction/compensation, SAR values are <u>ONLY</u> scaled up, not down. The final results of this scaling is the <u>reported SAR</u> which appears on the Cover Page of this report.

13.5 Fluid Dielectric and Systems Performance Check

Fluid Dielectric and Systems Performance Check	
Fluid Dielectric Measurement Procedure	The fluid dielectric parameters of the Tissue Simulating Liquid (TSL) are measured using the Open-Ended Coax Method connected to an Agilent 8753ET Network Analyzer connected to a measurement server running Aprel Dielectric Property Measurement System. A frequency range of $\pm 100\text{MHz}$ for frequencies $> 300\text{MHz}$ and $\pm 50\text{MHz}$ for frequencies $\leq 300\text{MHz}$ with frequency step size of 10MHz is used. The center frequency is centered around the SAR measurement probe's calibration point for that TSL frequency range. A calibration of the setup is performed using a short-open-deionized water (at 23°C in a 300ml beaker) method. A sample of the TSL is placed in a 300ml beaker and the open-ended coax is submerged approximately 8mm below the fluid surface in the approximate center of the beaker. A check of the setup is made to ensure no air is trapped under the open-ended coax. The sample of TSL is measured and compared to the IEC/IEEE 62209-1528 targets for HEAD or BODY for the entire fluid measurement range. Fluid adjustment are made if the dielectric parameters are $> 5\%$ in range that the DUT is to be tested. If the adjustments fail to bring the parameters to $\leq 5\%$ but are $< 10\%$, the SAR Fluid Sensitivity as per IEC/IEEE 62209-1528 and FCC KDB 865664 are applied to the highest measured SAR. A TSL with dielectric parameters $> 10\%$ in the DUT test frequency range are not used.
Systems Performance Check	The fluid dielectric parameters of the Active TSL are entered into the DASY Measurement Server at each of the 10MHz step size intervals. Active meaning the TSL used during the SAR evaluation of the DUT. The DASY Measurement System will automatically interpolate the dielectric parameters for DUT test frequencies that fall between the 10MHz step intervals. A Systems Performance Check (SPC) is performed in accordance with IEC/IEEE 62209-1528 "System Check" and FCC KDB 865664 "System Verification". A validation source, dipole or Confined Loop Antenna (CLA), is placed under the geometric center of the phantom and separated from the phantom in accordance to the validation source's Calibration Certificate data. A CW signal set to the frequency of the validate source's and SAR measurement probe's calibration frequency with a forward power set to the validation source's Calibration Certificate data power setting is applied to the validation source. An Area Scan is centered over the projection of the validation source's feed point and an Area Scan is taken. A Zoom Scan centered over the Peak SAR measurement of the Area Scan and the 1g and 10g SAR is measured. The measured 1g and 10g SAR is compared to the 1g and 10g SAR measurements from the validation source's Calibration Certificate. When required, the measured SAR is normalized to 1.0W and compared to the normalized SAR indicated on the validation source's Calibration Certificate. The SPC is considered valid when the measured and normalized SAR is $\leq 10\%$ of the measured and normalized SAR of the validation source's Calibration Certificate. The fluid dielectric parameters of the Active TSL and SPC are repeated when the Active TSL has been in use for greater than 84 hours or if the Active TSL temperature has exceed $\pm 1^{\circ}\text{C}$ of the initial fluid analysis.

13.6 Scan Resolution 100MHz to 2GHz

Scan Resolution 100MHz to 2GHz	
Maximum distance from the closest measurement point to phantom surface: (Geometric Center of Probe Center)	$4 \pm 1 \text{ mm}$
Maximum probe angle normal to phantom surface. (Flat Section ELI Phantom)	$5^{\circ} \pm 1^{\circ}$
Area Scan Spatial Resolution $\Delta X, \Delta Y$	15 mm
Zoom Scan Spatial Resolution $\Delta X, \Delta Y$	7.5 mm
Zoom Scan Spatial Resolution ΔZ (Uniform Grid)	5 mm
Zoom Scan Volume X, Y, Z	30 mm
Phantom	ELI
Fluid Depth	$150 \pm 5 \text{ mm}$
An Area Scan with an area extending beyond the device was used to locate the candidate maximas within 2dB of the global maxima.	
A Zoom Scan centered over the peak SAR location(s) determined by the Area Scan was used to determine the 1-gram and 10-gram peak spatial-average SAR	

13.7 Scan Resolution 2GHz to 3GHz

Scan Resolution 2GHz to 3GHz	
Maximum distance from the closest measurement point to phantom surface: (Geometric Center of Probe Center)	4 ± 1 mm
Maximum probe angle normal to phantom surface. (Flat Section ELI Phantom)	5° ± 1°
Area Scan Spatial Resolution $\Delta X, \Delta Y$	12 mm
Zoom Scan Spatial Resolution $\Delta X, \Delta Y$	5 mm
Zoom Scan Spatial Resolution ΔZ (Uniform Grid)	5 mm
Zoom Scan Volume X, Y, Z	30 mm
Phantom	ELI
Fluid Depth	150 ± 5 mm
An Area Scan with an area extending beyond the device was used to locate the candidate maximas within 2dB of the global maxima.	
A Zoom Scan centered over the peak SAR location(s) determined by the Area Scan was used to determine the 1-gram and 10-gram peak spatial-average SAR	

13.8 Scan Resolution 5GHz to 6GHz

Scan Resolution 5GHz to 6GHz	
Maximum distance from the closest measurement point to phantom surface: (Geometric Center of Probe Center)	4 ± 1 mm
Maximum probe angle normal to phantom surface. (Flat Section ELI Phantom)	5° ± 1°
Area Scan Spatial Resolution $\Delta X, \Delta Y$	10 mm
Zoom Scan Spatial Resolution $\Delta X, \Delta Y$	4 mm
Zoom Scan Spatial Resolution ΔZ (Uniform Grid)	2 mm
Zoom Scan Volume X, Y, Z	22 mm
Phantom	ELI
Fluid Depth	100 ± 5 mm
An Area Scan with an area extending beyond the device was used to locate the candidate maximas within 2dB of the global maxima.	
A Zoom Scan centered over the peak SAR location(s) determined by the Area Scan was used to determine the 1-gram and 10-gram peak spatial-average SAR	

14.0 MEASUREMENT UNCERTAINTIES

Table 14.1 Measurement Uncertainty

UNCERTAINTY BUDGET FOR DEVICE EVALUATION (IEC/IEEE 62209-1528 Table 9)									
Source of Uncertainty	Reference	Toler ±%	Prob Dist	Div	c _i	c _i	Stand Unct ±%	Stand Unct ±%	V _i or V _{eff}
Measurement System					(1g)	(10g)	(1g)	(10g)	
EX3DV4 Probe Calibration** (k=1)	E.2.1	6.7	N	1	1	1	6.7	6.7	∞
Axial Isotropy** (k=1)	E.2.2	0.6	R	√3	0.7	0.7	0.2	0.2	∞
Hemispherical Isotropy** (k=1)	E.2.2	3.2	R	√3	0.7	0.7	1.3	1.3	∞
Boundary Effect*	E.2.3	1.0	R	√3	1	1	0.6	0.6	∞
Linearity** (k=1)	E.2.4	0.5	R	√3	1	1	0.3	0.3	∞
System Detection Limits*	E.2.4	1.0	R	√3	1	1	0.6	0.6	∞
Modulation Response** (k=1)	E.2.5	8.3	R	√3	1	1	4.8	4.8	∞
Readout Electronics*	E.2.6	0.3	N	1	1	1	0.3	0.3	∞
Response Time*	E.2.7	0.8	R	√3	1	1	0.5	0.5	∞
Integration Time*	E.2.8	2.6	R	√3	1	1	1.5	1.5	∞
RF Ambient Conditions - Noise	E.6.1	0.0	R	√3	1	1	0.0	0.0	10
RF Ambient Conditions - Reflection	E.6.1	0.0	R	√3	1	1	0.0	0.0	10
Probe Positioner Mechanical Tolerance*	E.6.2	0.0	R	√3	1	1	0.0	0.0	∞
Probe Positioning wrt Phantom Shell*	E.6.3	0.4	R	√3	1	1	0.2	0.2	∞
Post-processing*	E.5	2.0	R	√3	1	1	1.2	1.2	∞
Test Sample Related									
Test Sample Positioning	E.4.2	2.2	N	1	1	1	2.2	2.2	5
Device Holder Uncertainty*	E.4.1	3.6	N	1	1	1	3.6	3.6	∞
SAR Drift Measurement ⁽²⁾	E.2.9	0.0	R	√3	1	1	0.0	0.0	∞
SAR Power Scaling ⁽³⁾	E.6.5	0.0	R	√3	1	1	0.0	0.0	∞
Phantom and Tissue Parameters									
Phantom Uncertainty*	E.3.1	6.1	R	√3	1	1	3.5	3.5	∞
SAR Correction Uncertainty	E.3.2	1.6	N	1	1	0.84	1.6	1.3	∞
Liquid Conductivity (measurement)	E.3.3	5.0	N	1	0.78	0.71	3.9	3.6	10
Liquid Permittivity (measurement)	E.3.3	5.0	N	1	0.23	0.26	1.2	1.3	10
Liquid Conductivity (Temperature)	E.3.2	0.4	R	√3	0.78	0.71	0.2	0.2	10
Liquid Permittivity Temperature)	E.3.2	0.2	R	√3	0.23	0.26	0.0	0.0	10
Effective Degrees of Freedom⁽¹⁾								V_{eff} =	1141
Combined Standard Uncertainty			RSS				11.1	11.0	
Expanded Uncertainty (95% Confidence Interval)			k=2				22.2	21.9	
Measurement Uncertainty Table in accordance with IEC/IEEE 62209-1528									

(1) The Effective Degrees of Freedom is > 30

Therefore a coverage factor of k=2 represents an approximate confidence level of 95%.

(2) The SAR Value is compensated for Drift

(3) SAR Power Scaling not Required

* Provided by SPEAG for DASY4

Table 14.2 Calculation of Degrees of Freedom

Calculation of the Degrees and Effective Degrees of Freedom	
$v_i = n - 1$	$v_{\text{eff}} = \frac{u_c^4}{m \sum_{i=1} \frac{c_i^4 u_i^4}{v_i}}$

15.0 FLUID DIELECTRIC PARAMETERS

Table 15.1 Fluid Dielectric Parameters 2450MHz HEAD TSL

Aprél Laboratory

Test Result for UIM Dielectric Parameter

Wed 14/Sep/2022 12:40:45

Freq Frequency(GHz)

FCC_eH FCC OET 65 Supplement C (June 2001) Limits for Head Epsilon

FCC_sH FCC OET 65 Supplement C (June 2001) Limits for Head Sigma

Test_e Epsilon of UIM

Test_s Sigma of UIM

Freq	FCC_eH	FCC_sH	Test_e	Test_s
2.3500	39.38	1.71	36.91	1.80
2.3600	39.36	1.72	36.66	1.82
2.3700	39.34	1.73	36.49	1.80
2.3800	39.32	1.74	36.62	1.81
2.3900	39.31	1.75	36.54	1.84
2.4000	39.29	1.76	36.51	1.84
2.4100	39.27	1.76	36.62	1.86
2.4200	39.25	1.77	36.59	1.89
2.4300	39.24	1.78	36.60	1.87
2.4400	39.22	1.79	36.57	1.90
2.4500	39.20	1.80	36.38	1.92
2.4600	39.19	1.81	36.48	1.92
2.4700	39.17	1.82	36.41	1.93
2.4800	39.16	1.83	36.42	1.95
2.4900	39.15	1.84	36.30	1.95
2.5000	39.14	1.85	36.22	1.98
2.5100	39.12	1.87	36.18	1.97
2.5200	39.11	1.88	36.16	2.00
2.5300	39.10	1.89	36.17	1.99
2.5400	39.09	1.90	36.07	2.01
2.5500	39.07	1.91	36.29	2.04

FLUID DIELECTRIC PARAMETERS							
Date:	14 Sep 2022	Fluid Temp:	23.8	Frequency:	2450MHz	Tissue:	Head
Freq (MHz)		Test_e	Test_s	Target_e	Target_s	Deviation Permittivity	Deviation Conductivity
2350.0000		36.9100	1.8000	39.3800	1.71	-6.27%	5.26%
2360.0000		36.6600	1.8200	39.3600	1.72	-6.86%	5.81%
2370.0000		36.4900	1.8000	39.3400	1.73	-7.24%	4.05%
2380.0000		36.6200	1.8100	39.3200	1.74	-6.87%	4.02%
2390.0000		36.5400	1.8400	39.3100	1.75	-7.05%	5.14%
2400.0000		36.5100	1.8400	39.2900	1.76	-7.08%	4.55%
2402.0000	*	36.5320	1.8440	39.2860	1.76	-7.01%	4.77%
2410.0000		36.6200	1.8600	39.2700	1.76	-6.75%	5.68%
2412.0000	*	36.6140	1.8660	39.2660	1.76	-6.75%	5.90%
2420.0000		36.5900	1.8900	39.2500	1.77	-6.78%	6.78%
2430.0000		36.6000	1.8700	39.2400	1.78	-6.73%	5.06%
2437.0000	*	36.5790	1.8910	39.2260	1.79	-6.75%	5.82%
2440.0000		36.5700	1.9000	39.2200	1.79	-6.76%	6.15%
2442.0000	*	36.5320	1.9040	39.2160	1.79	-6.84%	6.25%
2450.0000		36.3800	1.9200	39.2000	1.80	-7.19%	6.67%
2460.0000		36.4800	1.9200	39.1900	1.81	-6.92%	6.08%
2462.0000	*	36.4660	1.9220	39.1860	1.81	-6.94%	6.07%
2470.0000		36.4100	1.9300	39.1700	1.82	-7.05%	6.04%
2480.0000		36.4200	1.9500	39.1600	1.83	-7.00%	6.56%
2490.0000		36.3000	1.9500	39.1500	1.84	-7.28%	5.98%
2500.0000		36.2200	1.9800	39.1400	1.85	-7.46%	7.03%
2510.0000		36.1800	1.9700	39.1200	1.87	-7.52%	5.35%
2520.0000		36.1600	2.0000	39.1100	1.88	-7.54%	6.38%
2530.0000		36.1700	1.9900	39.1000	1.89	-7.49%	5.29%
2540.0000		36.0700	2.0100	39.0900	1.90	-7.73%	5.79%
2550.0000		36.2900	2.0400	39.0700	1.91	-7.12%	6.81%

*Channel Frequency Tested

16.0 SYSTEM VERIFICATION TEST RESULTS

Table 16.1 System Verification Results 2450MHz HEAD TSL

System Verification Test Results					
Date		Frequency (MHz)	Validation Source		
			P/N	S/N	
14 Sep 2022		2450	D2450V2	825	
Fluid Type	Fluid Temp °C	Ambient Temp °C	Ambient Humidity (%)	Forward Power (mW)	Source Spacing (mm)
Head	23.8	25	19%	250	10
Fluid Parameters					
Permittivity			Conductivity		
Measured	Target	Deviation	Measured	Target	Deviation
36.38	39.20	-7.19%	1.92	1.80	6.67%
Measured SAR					
1 gram			10 gram		
Measured	Target	Deviation	Measured	Target	Deviation
12.70	13.18	-3.64%	5.91	6.01	-1.58%
Measured SAR Normalized to 1.0W					
1 gram			10 gram		
Normalized	Target	Deviation	Normalized	Target	Deviation
50.80	52.72	-3.64%	23.64	24.02	-1.56%
Prior to the SAR evaluations, system checks were performed on the planar section of the phantom and a SPEAG validation dipole in accordance with the procedures described in IEEE 1528-2013, FCC KDB 846224, IEC 62209-1 and IEC 62209-1528. The dielectric parameters of the simulated tissue mixture were measured prior to the system performance check using a Dielectric Probe Kit and a Network Analyzer. The forward power was applied to the dipole and the system was verified to a tolerance of +10% from the system manufacturer's dipole calibration target SAR value. The forward power applied was same forward power applied by the calibration lab during the calibration of this validation source.					

17.0 SYSTEM VALIDATION SUMMARY

Table 17.1 System Validation Summary

SAR Validation SummaryChart					
Validation Date	Validation Source	Validation Frequency	Linearity	Isotropy	Extrapolation
✓	= Complete	✓	= Not Required		
3-May-22	D2450V2	2450	✓	✓	✓

18.0 MEASUREMENT SYSTEM SPECIFICATIONS

Table 18.1 Measurement System Specifications

Measurement System Specification	
Specifications	
Positioner	Stäubli Unimation Corp. Robot Model: TX90XL
Repeatability	+/- 0.035 mm
No. of axis	6.0
Data Acquisition Electronic (DAE) System	
Cell Controller	
Processor	Intel(R) Core(TM) i7-7700
Clock Speed	3.60 GHz
Operating System	Windows 10 Professional
Data Converter	
Features	Signal Amplifier, multiplexer, A/D converter, and control logic
Software	Measurement Software: DASY6, V 6.4.0.12171 / DASY52 V52.10.0.1446
	Postprocessing Software: SEMCAD X, V14.6.10(Deployment Build)
Connecting Lines	Optical downlink for data and status info., Optical uplink for commands and clock
DASY Measurement Server	
Function	Real-time data evaluation for field measurements and surface detection
Hardware	Intel ULV Celeron CPU 400 MHz; 128 MB chip disk; 128 MB RAM
Connections	COM1, COM2, DAE, Robot, Ethernet, Service Interface
E-Field Probe	
Model	EX3DV4
Serial No.	3600
Construction	Triangular core fiber optic detection system
Frequency	10 MHz to 6 GHz
Linearity	±0.2 dB (30 MHz to 3 GHz)
Phantom	
Type	ELI Elliptical Planar Phantom
Shell Material	Fiberglass
Thickness	2mm +/- .2mm
Volume	> 30 Liter

Measurement System Specification		
Probe Specification		
Construction:	Symmetrical design with triangular core; Built-in shielding against static charges PEEK enclosure material (resistant to organic solvents, glycol)	
Calibration:	In air from 10 MHz to 2.5 GHz In head simulating tissue at frequencies of 900 MHz and 1.8 GHz (accuracy $\pm 8\%$)	
Frequency:	10 MHz to > 6 GHz; Linearity: ± 0.2 dB (30 MHz to 3 GHz)	
Directivity:	± 0.2 dB in head tissue (rotation around probe axis) ± 0.4 dB in head tissue (rotation normal to probe axis)	
Dynamic Range:	5 μ W/g to > 100 mW/g; Linearity: ± 0.2 dB	
Surface Detect:	± 0.2 mm repeatability in air and clear liquids over diffuse reflecting surfaces	
Dimensions:	Overall length: 330 mm; Tip length: 16 mm; Body diameter: 12 mm; Tip diameter: 6.8 mm Distance from probe tip to dipole centers: 2.7 mm	
Application:	General dosimetry up to 3 GHz; Compliance tests of mobile phone	EX3DV4 E-Field Probe
Phantom Specification		
The ELI V5.0 phantom is an elliptical planar fiberglass shell phantom with a shell thickness of 2.0mm $\pm$.2mm at the planar area. This phantom conforms to OET Bulletin 65, Supplement C, IEEE 1528-2013, IEC 62209-1, IEC 62209-2 and IEC/IEEE 62209-1528.		
		ELI Phantom
Device Positioner Specification		
The DASY device positioner has two scales for device rotation (with respect to the body axis) and the device inclination (with respect to the line between the ear openings). The plane between the ear openings and the mouth tip has a rotation angle of 65°. The bottom plate contains three pair of bolts for locking the device holder. The device holder positions are adjusted to the standard measurement positions in the three sections.		
		Device Positioner

19.0 TEST EQUIPMENT LIST

Table 19.1 Equipment List and Calibration

Test Equipment List				
DESCRIPTION	ASSET NO.	SERIAL NO.	DATE CALIBRATED	CALIBRATION DUE
Schmid & Partner DASY 6 System	-	-	-	-
-DASY Measurement Server	00158	1078	CNR	CNR
-Robot	00046	599396-01	CNR	CNR
-DAE4	00019	353	14-Apr-22	14-Apr-23
-EX3DV4 E-Field Probe	00213	3600	20-Apr-22	20-Apr-23
-CLA 30 Validation Dipole	00300	1005	18-Mar-20	18-Mar-23
-CLA150 Validation Dipole	00251	4007	18-Mar-20	18-Mar-23
-D450V3 Validation Dipole	00221	1068	27-Apr-21	27-Apr-24
-D835V2 Validation Dipole	00217	4D075	27-Apr-21	27-Apr-24
-D900V2 Validation Dipole	00020	54	16-Mar-20	16-Mar-23
ALS-D-01640-S-2	00299	207-00102	15-Dec-20	15-Dec-23
-D1800V2 Validation Dipole	00222	247	16-Mar-20	16-Mar-23
-D1900V2 Validation Dipole	00218	5d107	16-Mar-20	16-Mar-23
-D2450V2 Validation Dipole	00219	825	24-Apr-21	24-Apr-24
-D5GHzV2 Validation Dipole	00126	1031	27-Apr-21	27-Apr-24
ELI Phantom	00247	1234	CNR	CNR
SAM Phantom	00154	1033	CNR	CNR
HP 85070C Dielectric Probe Kit	00033	none	CNR	CNR
HP 8753ET Network Analyzer	00134	US39170292	6-Jan-21	6-Jan-24
Rohde & Schwarz SMR20 Signal Generator	00006	100104	11-Aug-20	11-Aug-23
Amplifier Research 10W1000C Power Amplifier	00041	27887	CNR	CNR
Amplifier Research 5S1G4 Power Amplifier	00106	26235	CNR	CNR
Narda Directional Coupler 3020A	00064	-	CNR	CNR
Kangaroo VWR Humidity/Thermometer	00334	192385455	5-Aug-19	6-Aug-22
Digital Multi Meter DMR-1800	00250	TE182	23-Jun-20	23-Jun-23
Bipolar Power Supply 6299A	00086	1144A02155	CNR	CNR
DC-18G 10W 30db Attenuator	00102	-	COU	COU
R&S FSP40 Spectrum Analyzer	00241	100500	9-Aug-21	9-Aug-24
HP 8566B Spectrum Analyzer	00051	2747A055100	29-Jun-20	29-Jun-23
RF Cable-SMA	00311	-	CNR	CNR
HP Calibration Kit	00145	-	CNR	CNR

CNR = Calibration Not Required

COU = Calibrate on Use

20.0 FLUID COMPOSITION

Table 20.1 Fluid Composition 2450MHz HEAD TSL

Tissue Simulating Liquid (TSL) Composition				2450MHz Body
Component by Percent Weight				
Water	Glycol	Salt ⁽¹⁾	HEC ⁽²⁾	Bacteriacide ⁽³⁾
69.98	30.0	0.02	0.0	0.0

(1) Non-Iodinized

(2) HydroxyEthyl-Cellulose: Sigma-Aldrich P/N 54290-500g

(3) Dow Chemical Dowicil 75 Antimicrobial Perservative

END OF REPORT

APPENDIX A – SYSTEM VERIFICATION PLOTS

DUT: Dipole 2450 MHz D2450V2; Type: D2450V2; Serial: D2450V2 - SN:825
Procedure Name: SPC 2450H_Input=250mw, Target=[11.86]13.18[14.50]W/kg 1G target = 52.719

Communication System: UID 0, CW (0); Frequency: 2450 MHz; Duty Cycle: 1:1
 Medium parameters used: $f = 2450$ MHz; $\sigma = 1.92$ S/m; $\epsilon_r = 36.38$; $\rho = 1000$ kg/m³
 Phantom section: Flat Section

Date/Time: 9/14/2022 4:44:26 PM

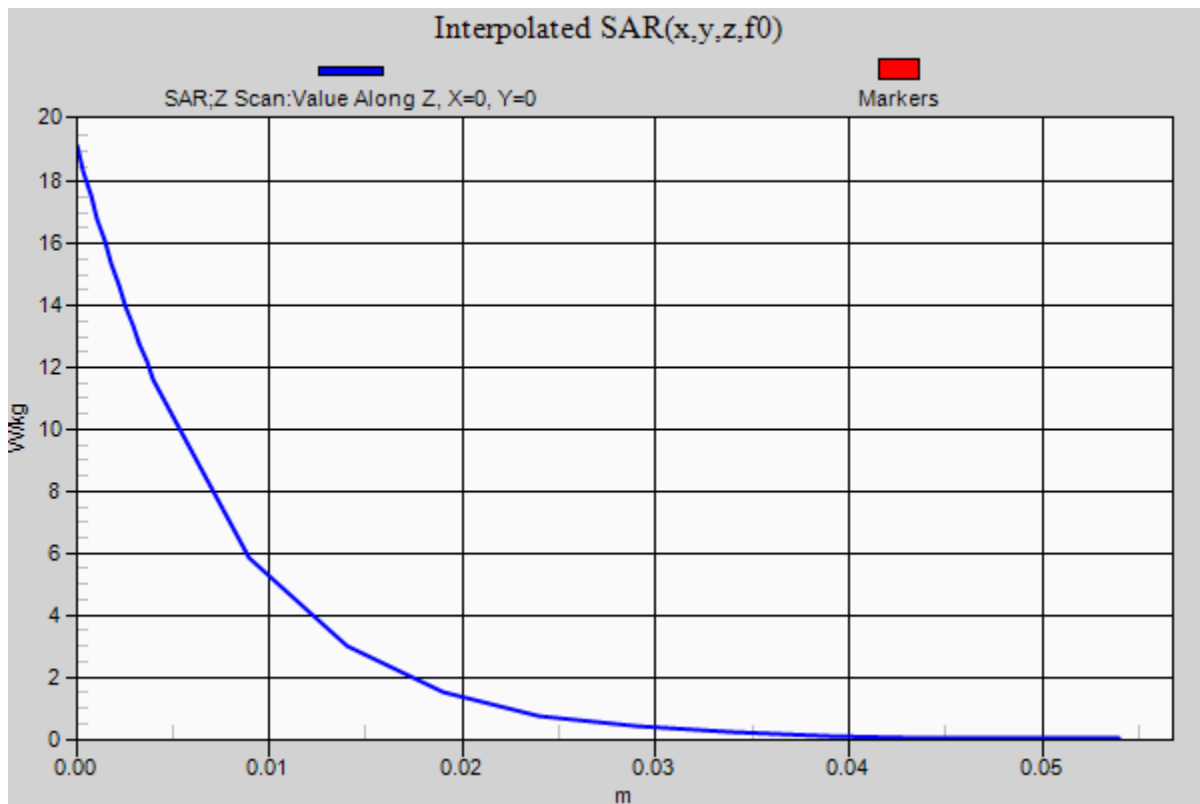
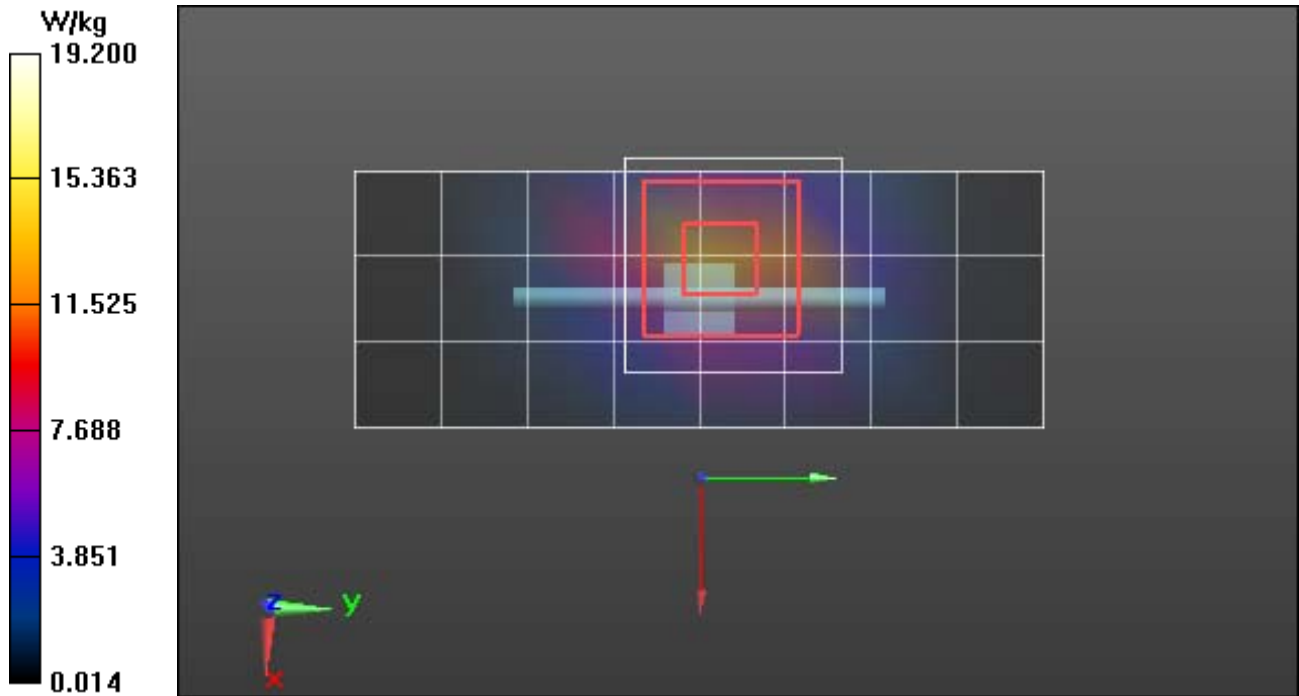
DASY5 Configuration:

- Probe: EX3DV4 - SN3600; ConvF(6.58, 6.58, 6.58) @ 2450 MHz; Calibrated: 4/20/2022
- Sensor-Surface: 4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn353; Calibrated: 4/14/2022
- Phantom: Twin-SAM V4.0 (30deg probe tilt); Type: QD 000 P40 CC; Serial: xxxx
- Measurement SW: DASY52, Version 52.10 (3); SEMCAD X Version 14.6.13 (7474)

SPC/SPC 2450H_Input=250mw, Target=[11.86]13.18[14.50]W/kg 1G target = 52.719/Area Scan (4x9x1): Measurement grid:
 dx=12mm, dy=12mm
 Maximum value of SAR (measured) = 13.5 W/kg

SPC/SPC 2450H_Input=250mw, Target=[11.86]13.18[14.50]W/kg 1G target = 52.719/Zoom Scan (7x7x7)/Cube 0: Measurement grid: dx=5mm, dy=5mm, dz=5mm
 Reference Value = 76.68 V/m; Power Drift = 0.22 dB
 Peak SAR (extrapolated) = 27.0 W/kg
SAR(1 g) = 12.7 W/kg; SAR(10 g) = 5.91 W/kg
 Smallest distance from peaks to all points 3 dB below = 11 mm
 Ratio of SAR at M2 to SAR at M1 = 47.9%
 Maximum value of SAR (measured) = 14.2 W/kg

SPC/SPC 2450H_Input=250mw, Target=[11.86]13.18[14.50]W/kg 1G target = 52.719/Z Scan (1x1x22): Measurement grid:
 dx=20mm, dy=20mm, dz=5mm
 Penetration depth = 7.408 (7.275, 7.384) [mm]
 Maximum value of SAR (interpolated) = 19.2 W/kg



APPENDIX B – MEASUREMENT PLOTS OF MAXIMUM MEASURED SAR

Plot B10

DUT: A04394; Type: Transmitter; Serial: Sample Prototype

Procedure Name: B10-A04394, Body- Back Side, 2442MHz, 5.5 bits WIFI

Communication System: UID 0, CW (0); Frequency: 2442 MHz; Duty Cycle: 1:1
Medium parameters used (interpolated): $f = 2442$ MHz; $\sigma = 1.904$ S/m; $\epsilon_r = 36.532$; $\rho = 1000$ kg/m³
Phantom section: Flat Section

Date/Time: 9/15/2022 3:55:30 PM

DASY5 Configuration:

- Probe: EX3DV4 - SN3600; ConvF(6.58, 6.58, 6.58) @ 2442 MHz; Calibrated: 4/20/2022
- Sensor-Surface: 4mm (Mechanical Surface Detection (Locations From Previous Scan Used)), Sensor-Surface: 4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn353; Calibrated: 4/14/2022
- Phantom: Twin-SAM V4.0 (30deg probe tilt); Type: QD 000 P40 CC; Serial: xxxx
- Measurement SW: DASY52, Version 52.10 (3); SEMCAD X Version 14.6.13 (7474)

2450H/B10-A04394, Body- Back Side, 2442MHz, 5.5 bits WIFI/Area Scan (8x11x1): Measurement grid: dx=12mm, dy=12mm

[Info: Interpolated medium parameters used for SAR evaluation.](#)

Maximum value of SAR (measured) = 0.802 W/kg

2450H/B10-A04394, Body- Back Side, 2442MHz, 5.5 bits WIFI/Zoom Scan (7x7x7)/Cube 0: Measurement grid: dx=5mm, dy=5mm, dz=5mm

Reference Value = 13.85 V/m; Power Drift = -0.42 dB

Peak SAR (extrapolated) = 1.68 W/kg

SAR(1 g) = 0.681 W/kg; SAR(10 g) = 0.299 W/kg

Smallest distance from peaks to all points 3 dB below = 9.2 mm

Ratio of SAR at M2 to SAR at M1 = 43%

[Info: Interpolated medium parameters used for SAR evaluation.](#)

Maximum value of SAR (measured) = 0.770 W/kg

2450H/B10-A04394, Body- Back Side, 2442MHz, 5.5 bits WIFI/Z Scan (1x1x22): Measurement grid: dx=20mm, dy=20mm, dz=5mm

[Info: Interpolated medium parameters used for SAR evaluation.](#)

Penetration depth = 7.773 (7.531, 7.844) [mm]

Maximum value of SAR (interpolated) = 0.534 W/kg

