



SAR EVALUATION REPORT

IEEE Std 1528-2013

For
51mm Extremity Worn Digital Transceiver

FCC ID: IPH-04809
Model Name: A04809

Report Number: 16028751-S1
Issue Date: 2025-11-03

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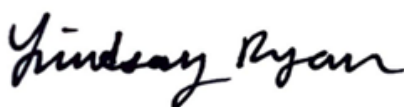
Revision History

Rev.	Date	Revisions	Revised By
V1	2025-11-03	Initial Issue	--

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1. Attestation of Test Results

Applicant Name		Garmin International Inc.	
FCC ID		IPH-04809	
Model Name		A04809	
Applicable Standards		Published RF exposure KDB procedures. IEEE Std 1528-2013	
Exposure Category		SAR Limits (W/Kg)	
		Peak spatial-average (1g of tissue)	Extremities (hands, wrists, ankles, etc.) (10g of tissue)
General population / Uncontrolled exposure		1.6	4
RF Exposure Conditions		Equipment Class - Highest Reported SAR (W/kg)	
		PCT	
Head		0.061	
Extremity		0.053	
Simultaneous TX	Head	0.129	
	Extremity	0.075	
Date Tested		2025-10-23 to 2025-10-24	
Test Results		Complies	
Note: This report is a Class II Permissive Change of UL report R15626956-S1. Please refer to UL report R15626956-S1 for all other SAR and conducted testing. UL LLC tested the above equipment in accordance with the requirements set forth in the above standards. The test results show that the equipment tested can demonstrate compliance with the requirements as documented in this report. This report contains data provided by the customer which can impact the validity of results. UL LLC is only responsible for the validity of results after the integration of the data provided by the customer. The results documented in this report apply only to the tested sample, under the conditions and modes of operation as described herein. It is the manufacturer's responsibility to ensure that additional production units of this model are manufactured with identical electrical and mechanical components. All samples tested were in good operating condition throughout the entire test program. Measurement Uncertainties are published for informational purposes only and were not considered unless noted otherwise. This document may not be altered or revised in any way unless done so by UL LLC and all revisions are noted in the revisions section. Any alteration of this document not carried out by UL LLC will constitute fraud and shall nullify the document. This report must not be used by the client to claim product certification, approval, or endorsement by A2LA, NIST, or any agency of the U.S. Government, or any agency of the U.S. government.			
Approved & Released By:		Prepared By:	
			
Sunghoon Kim Senior Laboratory Engineer UL Korea, Ltd. Suwon Laboratory		Lindsay Ryan Project Engineer UL LLC	

2. Test Specification, Methods and Procedures

The tests documented in this report were performed in accordance with FCC 47 CFR § 2.1093, IEEE Std 1528-2013, the following FCC Published RF exposure [KDB](#) procedures:

- 447498 D01 General RF Exposure Guidance v06
- 447498 D03 Supplement C Cross-Reference v01
- 865664 D01 SAR measurement 100 MHz to 6 GHz v01r04
- 865664 D02 RF Exposure Reporting v01r02
- 941225 D05 SAR for LTE Devices v02r05
- 941225 D05A LTE Rel.10 KDB Inquiry Sheet v01r02

In addition to the above, the following information was used:

- **TCB workshop** October 2014; RF Exposure Procedures (Other LTE Considerations)
- **TCB workshop** April 2015; RF Exposure Procedures (Overlapping LTE Bands)
- **TCB workshop** October 2015; RF Exposure Procedures (KDB 941225 D05A)
- **TCB workshop** October 2016; RF Exposure Procedures (DUT Holder Perturbations)

3. Facilities and Accreditation

UL LLC is accredited by A2LA, cert. # 0751.06 for all testing performed within the scope of this report. Testing was performed at the locations noted below.

The test sites and measurement facilities used to collect data are located at 2800 Perimeter Park Dr, Morrisville, NC, USA.

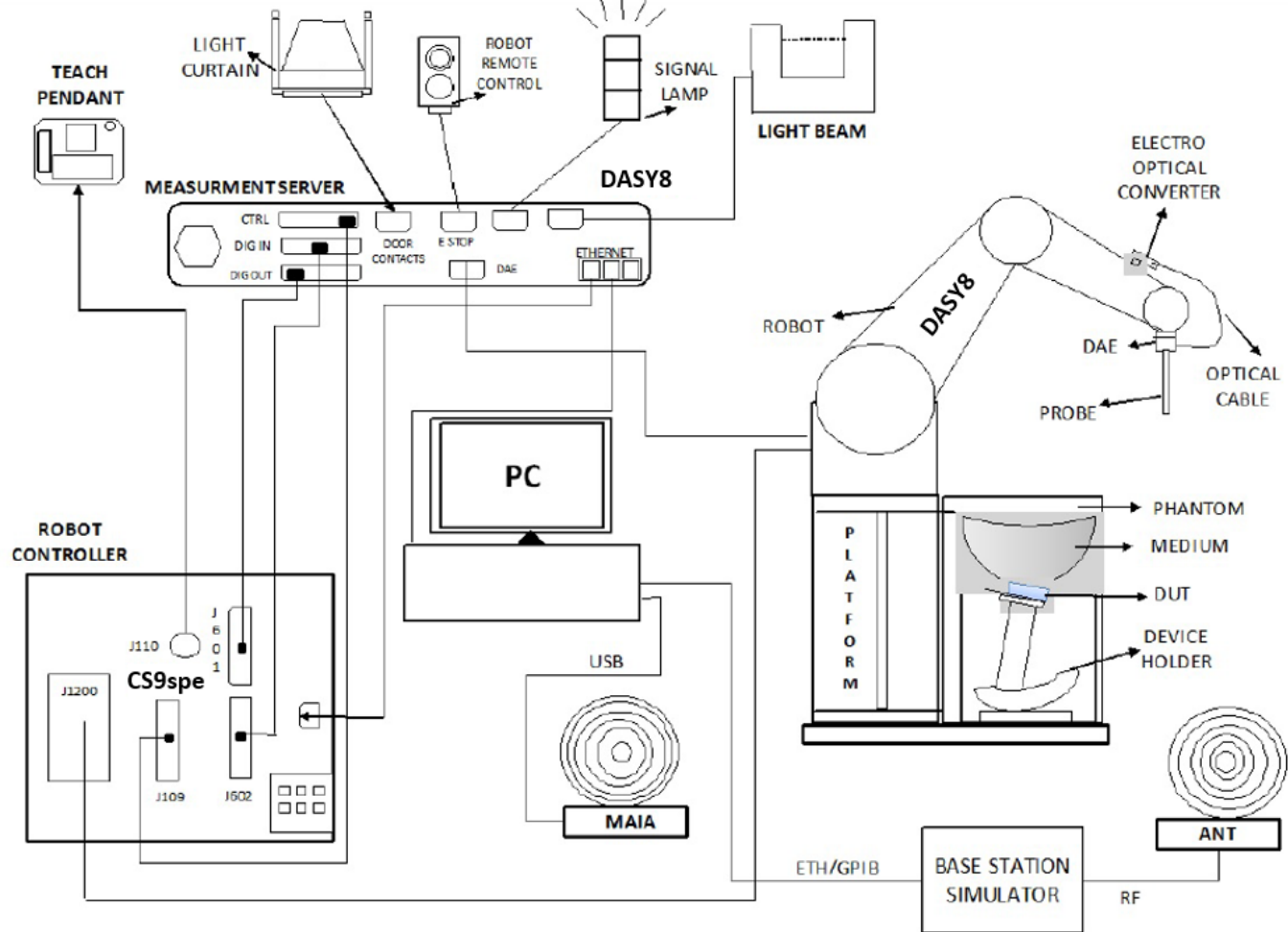
- SAR Lab 2A

	Address	ISED CABID	ISED Company Number	FCC Registration
☐	Building: 12 Laboratory Dr Durham, NC 27713, U.S.A	US0067	2180C	825374
☒	Building: 2800 Perimeter Park Dr. Suite B Morrisville, NC 27560, U.S.A	US0067	27265	825374

4. Measurement System & Test Equipment

4.1. SAR Measurement System

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



- A standard high precision 6-axis robot with controller, teach pendant and software. An arm extension for accommodating the data acquisition electronics (DAE).
- An isotropic Field probe optimized and calibrated for the targeted measurement.
- A data acquisition electronics (DAE) which performs the signal amplification, signal multiplexing, AD-conversion, offset measurements, mechanical surface detection, collision detection, etc. The unit is battery powered with standard or rechargeable batteries. The signal is optically transmitted to the EOC.
- The Electro-optical converter (EOC) performs the conversion from optical to electrical signals for the digital communication to the DAE. To use optical surface detection, a special version of the EOC is required. The EOC signal is transmitted to the measurement server.
- The function of the measurement server is to perform the time critical tasks such as signal filtering, control of the robot operation and fast movement interrupts.
- The Light Beam used is for probe alignment. This improves the (absolute) accuracy of the probe positioning.
- A computer running Win10 and the DASY8¹ software.
- Remote control and teach pendant as well as additional circuitry for robot safety such as warning lamps, etc.
- The phantom, the device holder and other accessories according to the targeted measurement.

¹ DASY8 software used: DASY16.4.0.5005 and older generations.

4.2. SAR Scan Procedures

Step 1: Power Reference Measurement

The Power Reference Measurement and Power Drift Measurements are for monitoring the power drift of the device under test in the batch process. The minimum distance of probe sensors to surface determines the closest measurement point to phantom surface. The minimum distance of probe sensors to surface is 2.1 mm. This distance cannot be smaller than the distance of sensor calibration points to probe tip as defined in the probe properties.

Step 2: Area Scan

The Area Scan is used as a fast scan in two dimensions to find the area of high field values, before doing a fine measurement around the hot spot. The sophisticated interpolation routines implemented in DASY software can find the maximum locations even in relatively coarse grids. When an Area Scan has measured all reachable points, it computes the field maximal found in the scanned area, within a range of the global maximum. The range (in dB) is specified in the standards for compliance testing. For example, a 2 dB range is required in IEC/IEEE 62209-1528, whereby 3 dB is a requirement when compliance is assessed in accordance with the ARIB standard (Japan). If only one Zoom Scan follows the Area Scan, then only the absolute maximum will be taken as reference. For cases where multiple maximums are detected, the number of Zoom Scans has to be increased accordingly.

Area Scan Parameters extracted from KDB 865664 D01 SAR Measurement 100 MHz to 6 GHz

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

Step 3: Zoom Scan

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

Zoom Scan Parameters extracted from KDB 865664 D01 SAR Measurement 100 MHz to 6 GHz

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

Step 4: Power drift measurement

The Power Drift Measurement measures the field at the same location as the most recent power reference measurement within the same procedure, and with the same settings. The Power Drift Measurement gives the field difference in dB from the reading conducted within the last Power Reference Measurement. This allows a user to monitor the power drift of the device under test within a batch process. The measurement procedure is the same as Step 1.

4.3. Test Equipment

The measuring equipment used to perform the tests documented in this report has been calibrated in accordance with the manufacturers' recommendations, and is traceable to recognized national standards.

Dielectric Property Measurements

Name of Equipment	Manufacturer	Type/Model	Serial No.	Cal. Date	Cal. Due Date
Network Analyzer	Keysight	E5063A	MY54100681	2025-08-01	2026-08-01
Dielectric Probe	SPEAG	DAKS-3.5	1147	2025-03-03	2026-03-03
Shorting Block	SPEAG	DAK-3.5 Short	SM DAK 200 DA	2025-03-03	2026-03-03

System Check

Name of Equipment	Manufacturer	Type/Model	Serial No.	Cal. Date	Cal. Due Date
RF Power Source	Speag	PowerSource1	4278	2025-06-12	2026-06-12

Lab Equipment

Name of Equipment	Manufacturer	Type/Model	Serial No.	Cal. Date	Cal. Due Date
E-Field Probe	SPEAG	EX3DV4	7711	2025-03-10	2026-03-10
Data Acquisition Electronics	SPEAG	DAE4	1715	2025-01-13	2026-01-13
System Validation Dipole	SPEAG	D1640V2	359	2025-04-30	2026-04-30
Environmental Indicator	Fisher Scientific	Traceable	240072452	2024-01-24	2026-01-24

5. Measurement Uncertainty

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

6. Device Under Test (DUT) Information

6.1. DUT Description

Back Cover	The Back Cover is not removable	
Battery Options	The rechargeable battery is not user accessible.	
Accessory	Strap 1, 2, 3. Refer to Appendix A.	
Test sample information	S/N 3617553879	Notes Radiated Sample #1
Hardware Version	A04809	
Software Version	16.29	

6.2. Wireless Technologies

Wireless technologies	Frequency bands	Operating mode	Duty Cycle used for SAR testing
LTE	FDD Band 2 FDD Band 4 FDD Band 12 NTN Band 23 NTN Band 255	QPSK 16QAM BPSK ¹ Does not support Carrier Aggregation (CA)	Cat eMTC M1 11.1% (QPSK) 34.4% (BPSK)
Wi-Fi	2.4 GHz	802.11b 802.11g 802.11n (HT20)	100% _(802.11b) ²
Bluetooth	2.4 GHz	BR, EDR, and LE	100% _(GFSK) ²
ANT/ANT+	2.4GHz	GFSK	N/A ³
NFC	13.56 MHz	Type A, B, A & B, F, A & F	100% _(Type F) ²

Notes:

1. NTN bands only.
2. Duty cycle is referenced from §9.
3. Measured Duty Cycle is not required due to SAR test exemption.
4. Only NTN n255 is being evaluated within this report. Please refer to UL report R15626956-S1 for output power data and all other SAR testing of supported technologies.

6.3. General LTE SAR Test and Reporting Considerations

Item	Description																																																																				
Frequency range, Channel Bandwidth, Numbers and Frequencies	Band 2	Frequency range: 1850 - 1910 MHz (BW = 60 MHz)																																																																			
		Channel Bandwidth																																																																			
		20 MHz	15 MHz	10 MHz	5 MHz	3 MHz	1.4 MHz																																																														
	Low	18700 /1860	18675/ 1857.5	18650/ 1855	18625/ 1852.5	18615/ 1851.5	18607/ 1850.7																																																														
	Mid	18900/ 1880	18900/ 1880	18900/ 1880	18900/ 1880	18900/ 1880	18900/ 1880																																																														
	High	19100/ 1900	19125/ 1902.5	19150/ 1905	19175/ 1907.5	19185/ 1908.5	19193/ 1909.3																																																														
	Band 4	Frequency range: 1710 - 1755 MHz (BW = 45 MHz)																																																																			
		Channel Bandwidth																																																																			
		20 MHz ¹	15 MHz	10 MHz	5 MHz	3 MHz	1.4 MHz																																																														
	Low	20050/ 1720	20025/ 1717.5	20000/ 1715	19975/ 1712.5	19965/ 1711.5	19957/ 1710.7																																																														
	Mid	20175/ 1732.5	20175/ 1732.5	20175/ 1732.5	20175/ 1732.5	20175/ 1732.5	20175/ 1732.5																																																														
	High	20300/ 1745	20325/ 1747.5	20350/ 1750	20375/ 1752.5	20385/ 1753.5	20393/ 1754.3																																																														
	Band 12	Frequency range: 699 – 716 MHz (BW = 17 MHz)																																																																			
		Channel Bandwidth																																																																			
		20 MHz	15 MHz	10 MHz ¹	5 MHz	3 MHz	1.4 MHz																																																														
	Low			23060/ 704	23035/ 701.5	23025/ 700.5	23017/ 699.7																																																														
	Mid			23095/ 707.5	23095/ 707.5	23095/ 707.5	23095/ 707.5																																																														
	High			23130/ 711	23155/ 713.5	23165/ 714.5	23173/ 715.3																																																														
	LTE transmitter and antenna implementation	Refer to Appendix A.																																																																			
Maximum power reduction (MPR)	Table 6.2.3-1: Maximum Power Reduction (MPR) for Power Class 1, 2 and 3 <table><tr><th rowspan="2">Modulation</th><th colspan="6">Channel bandwidth / Transmission bandwidth (N_{RB})</th><th rowspan="2">MPR (dB)</th></tr><tr><th>1.4 MHz</th><th>3.0 MHz</th><th>5 MHz</th><th>10 MHz</th><th>15 MHz</th><th>20 MHz</th></tr><tr><td>QPSK</td><td>> 5</td><td>> 4</td><td>> 8</td><td>> 12</td><td>> 16</td><td>> 18</td><td>≤ 1</td></tr><tr><td>16 QAM</td><td>≤ 5</td><td>≤ 4</td><td>≤ 8</td><td>≤ 12</td><td>≤ 16</td><td>≤ 18</td><td>≤ 1</td></tr><tr><td>16 QAM</td><td>> 5</td><td>> 4</td><td>> 8</td><td>> 12</td><td>> 16</td><td>> 18</td><td>≤ 2</td></tr><tr><td>64 QAM</td><td>≤ 5</td><td>≤ 4</td><td>≤ 8</td><td>≤ 12</td><td>≤ 16</td><td>≤ 18</td><td>≤ 2</td></tr><tr><td>64 QAM</td><td>> 5</td><td>> 4</td><td>> 8</td><td>> 12</td><td>> 16</td><td>> 18</td><td>≤ 3</td></tr><tr><td>256 QAM</td><td colspan="6">≥ 1</td><td>≤ 5</td></tr></table> MPR Built-in by design The manufacturer MPR values are always within the 3GPP maximum MPR allowance but may not follow the default MPR values. A-MPR (additional MPR) was disabled during SAR testing							Modulation	Channel bandwidth / Transmission bandwidth (N _{RB})						MPR (dB)	1.4 MHz	3.0 MHz	5 MHz	10 MHz	15 MHz	20 MHz	QPSK	> 5	> 4	> 8	> 12	> 16	> 18	≤ 1	16 QAM	≤ 5	≤ 4	≤ 8	≤ 12	≤ 16	≤ 18	≤ 1	16 QAM	> 5	> 4	> 8	> 12	> 16	> 18	≤ 2	64 QAM	≤ 5	≤ 4	≤ 8	≤ 12	≤ 16	≤ 18	≤ 2	64 QAM	> 5	> 4	> 8	> 12	> 16	> 18	≤ 3	256 QAM	≥ 1						≤ 5
Modulation	Channel bandwidth / Transmission bandwidth (N _{RB})						MPR (dB)																																																														
	1.4 MHz	3.0 MHz	5 MHz	10 MHz	15 MHz	20 MHz																																																															
QPSK	> 5	> 4	> 8	> 12	> 16	> 18	≤ 1																																																														
16 QAM	≤ 5	≤ 4	≤ 8	≤ 12	≤ 16	≤ 18	≤ 1																																																														
16 QAM	> 5	> 4	> 8	> 12	> 16	> 18	≤ 2																																																														
64 QAM	≤ 5	≤ 4	≤ 8	≤ 12	≤ 16	≤ 18	≤ 2																																																														
64 QAM	> 5	> 4	> 8	> 12	> 16	> 18	≤ 3																																																														
256 QAM	≥ 1						≤ 5																																																														
Power reduction	No																																																																				
Spectrum plots for RB configurations	A properly configured base station simulator was used for the SAR and power measurements; therefore, spectrum plots for each RB allocation and offset configuration are not included in the SAR report.																																																																				

7. RF Exposure Conditions (Test Configurations)

Only NTN n255 is being evaluated within this report. Please refer to UL report R15626956-S1 for all required test configuration requirements.

8. Dielectric Property Measurements & System Check

8.1. SAR Dielectric Property Measurements and System Checks

The temperature of the tissue-equivalent medium used during measurement must also be within 18°C to 25°C and within $\pm 2^\circ\text{C}$ of the temperature when the tissue parameters are characterized.

The dielectric parameters must be measured before the tissue-equivalent medium is used in a series of SAR measurements. The parameters should be re-measured after each 3 – 4 days of use; or earlier if the dielectric parameters can become out of tolerance; for example, when the parameters are marginal at the beginning of the measurement series.

Tissue dielectric parameters were measured at the low, middle and high frequency of each operating frequency range of the test device.

The dielectric constant (ϵ_r) and conductivity (σ) of typical tissue-equivalent media recipes are expected to be within $\pm 5\%$ of the required target values; but for SAR measurement systems that have implemented the SAR error compensation algorithms documented in IEEE Std 1528-2013, to automatically compensate the measured SAR results for deviations between the measured and required tissue dielectric parameters, the tolerance for ϵ_r and σ may be relaxed to $\pm 10\%$. This is limited to frequencies ≤ 3 GHz.

Tissue Dielectric Parameters

FCC KDB 865664 D01 SAR Measurement 100 MHz to 6 GHz

Target Frequency (MHz)	Head		Body	
	ϵ_r	σ (S/m)	ϵ_r	σ (S/m)
150	52.3	0.76	61.9	0.80
300	45.3	0.87	58.2	0.92
450	43.5	0.87	56.7	0.94
835	41.5	0.90	55.2	0.97
900	41.5	0.97	55.0	1.05
915	41.5	0.98	55.0	1.06
1450	40.5	1.20	54.0	1.30
1610	40.3	1.29	53.8	1.40
1800 – 2000	40.0	1.40	53.3	1.52
2450	39.2	1.80	52.7	1.95
3000	38.5	2.40	52.0	2.73
5000	36.2	4.45	49.3	5.07
5100	36.1	4.55	49.1	5.18
5200	36.0	4.66	49.0	5.30
5300	35.9	4.76	48.9	5.42
5400	35.8	4.86	48.7	5.53
5500	35.6	4.96	48.6	5.65
5600	35.5	5.07	48.5	5.77
5700	35.4	5.17	48.3	5.88
5800	35.3	5.27	48.2	6.00

Dielectric Property Measurements Results:

Liquid Check										
SAR Lab	Date	Tissue Type	Band (MHz)	Freq. (MHz)	Relative Permittivity (ϵ_r)			Conductivity (σ)		
					Measured	Target	Delta	Measured	Target	Delta
SAR 2A	2025-10-23	Head	1640	1640	43.9	40.3	9.08%	1.18	1.31	-9.71%
				1625	43.9	40.3	9.07%	1.17	1.30	-9.66%
				1675	43.9	40.2	9.15%	1.19	1.33	-10.00%

8.2. System Check

SAR system verification is required to confirm measurement accuracy, according to the tissue dielectric media, probe calibration points and other system operating parameters required for measuring the SAR of a test device. The system verification must be performed for each frequency band and within the valid range of each probe calibration point required for testing the device. The same SAR probe(s) and tissue-equivalent media combinations used with each specific SAR system for system verification must be used for device testing. When multiple probe calibration points are required to cover substantially large transmission bands, independent system verifications are required for each probe calibration point. A system verification must be performed before each series of SAR measurements using the same probe calibration point and tissue-equivalent medium. Additional system verification should be considered according to the conditions of the tissue-equivalent medium and measured tissue dielectric parameters, typically every three to four days when the liquid parameters are re-measured or sooner when marginal liquid parameters are used at the beginning of a series of measurements.

System Performance Check Measurement Conditions:

- The measurements were performed in the flat section of the TWIN SAM or ELI phantom, shell thickness: 2.0 ± 0.2 mm (bottom plate) filled with Body or Head simulating liquid of the following parameters.
- The depth of tissue-equivalent liquid in a phantom must be ≥ 15.0 cm for SAR measurements ≤ 3 GHz and ≥ 10.0 cm for measurements > 3 GHz.
- The DASY system with an E-Field Probe was used for the measurements.
- The dipole was mounted on the small tripod so that the dipole feed point was positioned below the center marking of the flat phantom section and the dipole was oriented parallel to the body axis (the long side of the phantom). The standard measuring distance was 10 mm (above 1 GHz) and 15 mm (below 1 GHz) from dipole center to the simulating liquid surface.
- The coarse grid with a grid spacing of 15 mm was aligned with the dipole.
For 5 GHz band - The coarse grid with a grid spacing of 10 mm was aligned with the dipole.
- Special 7x7x7 (below 3 GHz) and/or 8x8x7 (above 3 GHz) fine cube was chosen for the cube.
- Distance between probe sensors and phantom surface was set to 3 mm.
For 5 GHz band - Distance between probe sensors and phantom surface was set to 2.5 mm
- The dipole input power (forward power) was recorded and the results are normalized to 1 W input power.

System Check Results

The 1-g and 10-g SAR measured with a reference dipole, using the required tissue-equivalent medium at the test frequency, must be within $\pm 10\%$ of the manufacturer calibrated dipole SAR target. Refer to Appendix B for the SAR System Check Plots.

System Check													
SAR Lab	Date	Dipole Type & Serial Number	Dipole Cal. Due Date	Input Power (dBm)	Measured results for 1-g SAR				Measured results for 10-g SAR				Plot No.
					Meas. Zoom Scan	Normalize to 1 W	Target (Ref. Value)	Delta $\pm 10\%$	Meas. Zoom Scan	Normalize to 1 W	Target (Ref. Value)	Delta $\pm 10\%$	
SAR 2A	2025-10-23	D1640V2 SN: 359	2026-04-30	17.0	1.750	34.917	34.200	2.10%	0.964	19.234	18.600	3.41%	1

9. Conducted Output Power Measurements

This report covers NTN n255. Please refer to UL report R15626956-S1 for output power data for NTN n255 and all other SAR testing of supported technologies.

10. Measured and Reported (Scaled) SAR Results

SAR Test Reduction criteria are as follows:

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

KDB 447498 D01 General RF Exposure Guidance:

Testing of other required channels within the operating mode of a frequency band is not required when the reported 1-g or 10-g SAR for the mid-band or highest output power channel is:

- ≤ 0.8 W/kg or 2.0 W/kg, for 1-g or 10-g respectively, when the transmission band is ≤ 100 MHz
- ≤ 0.6 W/kg or 1.5 W/kg, for 1-g or 10-g respectively, when the transmission band is between 100 MHz and 200 MHz
- ≤ 0.4 W/kg or 1.0 W/kg, for 1-g or 10-g respectively, when the transmission band is ≥ 200 MHz

KDB 941225 D05 SAR for LTE Devices:

SAR test reduction is applied using the following criteria:

- Start with the largest channel bandwidth and measure SAR for QPSK with 1 RB, and 50% RB allocation, using the RB offset and required test channel combination with the highest maximum output power among RB offsets at the upper edge, middle and lower edge of each required test channel.
- When the reported SAR is > 0.8 W/kg, testing for other Channels is performed at the highest output power level for 1RB, and 50% RB configuration for that channel.
- Testing for 100% RB configuration is performed at the highest output power level for 100% RB configuration across the Low, Mid and High Channel when the highest reported SAR for 1 RB and 50% RB are > 0.8 W/kg. Testing for the remaining required channels is not needed because the reported SAR for 100% RB Allocation < 1.45 W/kg.
- Testing for 16-QAM modulation is not required because the reported SAR for QPSK is < 1.45 W/Kg and its output power is not more than 0.5 dB higher than that of QPSK.
- Testing for the other channel bandwidths is not required because the reported SAR for the highest channel bandwidth is < 1.45 W/Kg and its output power is not more than 0.5 dB higher than that of the highest channel bandwidth.
- For LTE bands that do not support at least three non-overlapping channels in certain channel bandwidths, test the available non-overlapping channels instead. When a device supports overlapping channel assignment in a channel bandwidth configuration, the middle channel of the group of overlapping channels should be selected for testing; therefore, the requirement for H, M and L channels may not fully apply.

10.1. NTN Band 255

RF Exposure Conditions	Mode	Dist. (mm)	Test Position	Accessory	Ch #.	Freq. (MHz)	RB Allocation	RB offset	Power (dBm)		1-g SAR (W/kg)		Plot No.
									Tune-up Limit	Meas.	Meas.	Scaled	
Head	BPSK	10	Front	Strap 1	261505	1626.6	1	10	22.5	21.4	0.026	0.033	1
					261674	1643.5	1	0	22.5	21.4	0.033	0.043	
					261843	1660.4	1	0	22.5	21.3	0.046	0.061	
				Strap 2	261843	1660.4	1	0	22.5	21.3	0.043	0.057	
				Strap 3	261843	1660.4	1	0	22.5	21.3	0.019	0.025	
RF Exposure Conditions	Mode	Dist. (mm)	Test Position	Accessory	Ch #.	Freq. (MHz)	RB Allocation	RB offset	Power (dBm)		10-g SAR (W/kg)		Plot No.
									Tune-up Limit	Meas.	Meas.	Scaled	
Extremity	BPSK	0	Back	Strap 1	261505	1626.6	1	10	22.5	21.4	0.017	0.022	2
					261674	1643.5	1	0	22.5	21.4	0.027	0.035	
					261843	1660.4	1	0	22.5	21.3	0.040	0.053	
				Strap 2	261843	1660.4	1	0	22.5	21.3	0.032	0.042	
				Strap 3	261843	1660.4	1	0	22.5	21.3	0.040	0.053	

11. SAR Measurement Variability

In accordance with published RF Exposure KDB 865664 D01 SAR measurement 100 MHz to 6 GHz. These additional measurements are repeated after the completion of all measurements requiring the same head or body tissue-equivalent medium in a frequency band. The test device should be returned to ambient conditions (normal room temperature) with the battery fully charged before it is re-mounted on the device holder for the repeated measurement(s) to minimize any unexpected variations in the repeated results.

- 1) Repeated measurement is not required when the original highest measured SAR is < 0.8 or 2 W/kg (1-g or 10-g respectively); steps 2) through 4) do not apply.
- 2) When the original highest measured SAR is ≥ 0.8 or 2 W/kg (1-g or 10-g respectively), repeat that measurement once.
- 3) Perform a second repeated measurement only if the **ratio of largest to smallest SAR** for the original and first repeated measurements is > 1.20 or when the original or repeated measurement is ≥ 1.45 or 3.6 W/kg (~ 10% from the 1-g or 10-g respective SAR limit).
- 4) Perform a third repeated measurement only if the original, first, or second repeated measurement is ≥ 1.5 or 3.75 W/kg (1-g or 10-g respectively) and the ratio of largest to smallest SAR for the original, first and second repeated measurements is > 1.20 .

Note(s):

Repeated measurement is not required since the original highest measured SAR is $< 0.8 \text{ W/kg}$ (1-g) or 2 W/kg (10-g) .

12. Simultaneous Transmission Conditions

The simultaneous transmission possibilities for this device are listed as below.

RF Exposure Condition	Item	Capable Transmit Configurations				
Standalone	1	WWAN	+	BT	+	NFC

RF Exposure conditions	Test Position	Standalone SAR (W/kg)			Σ 1-g SAR (W/kg)
		1	2	3	1+2+3
		WWAN	BT	NFC	
Head	Front	0.061	0.068	0.001	0.129

RF Exposure conditions	Test Position	Standalone SAR (W/kg)			Σ 10-g SAR (W/kg)
		1	2	3	1+2+3
		WWAN	BT	NFC	
Extremity	Back	0.053	0.022	0.001	0.075

Note:

BT and NFC data reference from UL report R15626956-S1.

Appendixes

Refer to separated files for the following appendixes.

Appendix A: SAR Setup Photos

Appendix B: SAR System Check Plots

Appendix C: SAR Highest Test Plots

Appendix D: Tissue Ingredients

Appendix E: Probe Certificates

Appendix F: Dipole Certificates

END OF REPORT