



**RF SAFETY
LAB**

A NEXT GENERATION
TEST LABORATORY™

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SAR EVALUATION REPORT

FCC ID:	IPH-A5169
IC:	1792A-A5169
HVIN/PMN/Model(s):	AA5169
FVIN:	2.20
Device Type:	Portable Digital Transceiver
Report Issue Date:	May 5, 2026

Garmin International, Inc.

1200 E. 151st Street,
Olathe, KS 66062, United States

Certification

FCC Equipment Class	Head SAR [W/kg]	Extremity SAR [W/kg]	10g Simultaneous Tx SAR [W/kg]
DTS	-	0.32	0.32
DSS	< 0.10	< 0.10	
DXX	-	< 0.10	
FCC Limit	1.6	4.0	4.0

Exposure Condition	Head SAR [W/kg]	Extremity SAR [W/kg]	10g Simultaneous Tx SAR [W/kg]
2.4 GHz WIFI	-	0.32	0.67
2.4 GHz Bluetooth	< 0.10	< 0.10	
2.4 GHz ANT/ANT+	-	-	
NFC	-	< 0.10	4.0
ISED Limits	1.6	4.0	

The measurement evaluations presented in this report are based on the maximum performance of the tested device(s), which has been shown to be capable of compliance for localized specific absorption rate (SAR) for uncontrolled environment / general population exposure federal limits in 47CFR § 1.1310 and Health Canada Safety Code 6 and has been tested in accordance with the measurement procedures specified within this report.

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Steve Liu
President



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1. DUT Specifics

1.1. Device under Test

The device under test is a portable digital transceiver, incorporating the technologies listed in Table 1-1 below. The manufacturer has confirmed that the device is within operational tolerances expected for production units and has the same physical, mechanical, and thermal characteristics expected for production units. The serial number of the device used for each test is indicated alongside the results.

1.2. Maximum SAR per Mode

Table 1-1 Maximum SAR Summary

Band/Mode	Frequency (MHz)	Head SAR [W/kg]	Extremity SAR [W/kg]
2.4 GHz WIFI	2412 - 2472 MHz	-	0.322
2.4 GHz Bluetooth	2402 - 2480 MHz	0.031	0.059
2.4 GHz ANT+	2402 - 2480 MHz	-	-
NFC	13.56 MHz	-	0.000

Note: The worst-case reported SAR of the reference model A05169 and the variant model AA5169 are included in the table above.

1.3. Maximum Time-Averaged Power From Manufacturer

The manufacturer has confirmed that this device follows the below target output power specifications and tolerances. SAR values were scaled to the maximum allowed power (including tolerance) to determine compliance per KDB Publication 447498 D04v01.

Tolerance +2/-2 dB is applicable to all bands/modes.



Table 1-2 2.4 GHz WIFI Target RF Output Power

2.4 GHz WIFI Maximum Power [dBm] - SISO						
Power Level	Channel Bandwidth [MHz]	Mode		802.11b	802.11g	802.11n
		Channel	Freq. [MHz]	2.4 GHz	2.4 GHz	2.4 GHz
Max	22 (802.11b)/ 20 (802.11g/n)	All		18	18	16.5
		1	2412		14.5	14.5
		10	2457		16	
		11	2462		15.5	14
		12	2467	10.5	10.5	10.5
		13	2472	10	10	10

Table 1-3 2.4 GHz Bluetooth Target RF Output Power

2.4 GHz Bluetooth Maximum Power [dBm]				
	Mode	Data Rate	Channel	2.4 GHz Antenna
Max	Bluetooth BR	1Mbps	0-78	12.0
	Bluetooth EDR	2Mbps	0-78	12.0
	Bluetooth EDR	3Mbps	0-78	12.0
	BLE	1/2Mbps	37	2.25
			0-35, 38	5.0
			39	1.5

Table 1-4 ANT/ANT+ Target RF Output Power

2.4 GHz ANT/ANT+ Target Power [dBm]		
Exposure Condition	Channel	2.4 GHz Antenna
Head/Extremity	1-2	2.25
	3-77	5.0
	78-79	2.0



1.4. Test Guidance Applied

- IEEE 1528-2013 (FCC)
- IEC/IEEE 62209-1528:2020 (ISED)
- RSS-102 Issue 6 (ISED)
- RSS-102.SAR.MEAS (ISED)
- Health Canada Safety Code 6 (ISED)
- FCC KDB Publication 941225 D05v02r05 (4G) (FCC/ISED)
- FCC KDB Publication 248227 D01v02r02 (SAR Considerations for 802.11 Devices) (FCC/ISED)
- FCC KDB Publication 447498 D04v01 (General SAR Guidance) (FCC/ISED)
- FCC KDB Publication 865664 D01v01r04, D02v01r02 (SAR Measurements up to 6 GHz) (FCC)
- FCC KDB Publication 484596 v03 (Referencing Test Data) (FCC)

2. Data Referencing Summary

Per manufacturer declaration, there are two models with high degree of similarity, reference model A05169 and variant model AA5169. The reference and variant models use the same material, form factor, circuit design, and components, including antennas and their locations.

The test results outlined in this report were conducted in accordance with the FCC KDB Publication 484596 v03 and RSS-102.SAR.MEAS, using the reference model test results as the basis for spotcheck testing of the variant model.

Per FCC KDB Publication 484596 v03, the worst-case reported SAR of each technology identified by the reference model was spotchecked on the variant model. When SAR spotchecks do not meet the criteria specified in FCC KDB Publication 484596 v03, full SAR testing is required.

Per RSS-102.SAR.MEAS Section 5.1.2.2, when the worst-case reported SAR of the reference model ≤ 1.2 W/kg (75% of the limit), SAR spotchecks are performed on the variant model for the head SAR and extremity SAR identified by the reference model. If SAR spotcheck is $> 30\%$, full SAR testing is required. Additionally, the conducted powers of the variant model shall be within the manufacturer's tune-up tolerance.

Please refer to Section 5 for full testing results, Section 4 for spotcheck test results, and Report SN 2026.008.01 for details on the reference model test results.



Table 2-1 Data Referencing Summary

Band/Mode	Antenna	Data referencing Verdict
2.4 GHz WIFI	2.4 GHz	DR
2.4 GHz Bluetooth	2.4 GHz	DR
NFC	NFC	FT

- DR: Data referencing Reference Model (See Data in Section 4)
- FT: Fully tested (See Data in Section 5)

3. ANT/ANT+ SAR Test Exemption Assessment

3.1. FCC SAR Test Exemption

Per FCC KDB 447498 D01 v06 Section 4.3.1, For 100 MHz to 6 GHz “1-g and 10-g SAR evaluation for general population exposure conditions, by measurement or numerical simulation, is not required when... *test separation distances* ≤ **50 mm**, the **10-g SAR test exclusion “numeric thresholds”**:

$$\frac{MaxPower}{Distance} \cdot \sqrt{f_{GHz}} \leq 7.5 \quad (\text{for 10-g SAR})$$

Where: f_{GHz} = RF Channel frequency in GHz
 $MaxPower$ = Power of channel, including tune-up tolerance, rounded to the nearest mW before calculation
 $Distance$ = Min. Test Separation Distance in mm, rounded to the nearest mm before calculation

Per FCC KDB 447498 D01 v06 Section 4.3.1, “Power and distance are rounded to the nearest mW and mm before calculation.” The result is rounded to one decimal place for comparison.

For ANT/ANT+, 5.0 dBm + 2 dB = 7.0 dBm = 5 mW

For distances ≤ 5mm, per FCC policy the value of 5 shall be used for the distance component of the equation.

$$\begin{aligned} \frac{MaxPower}{Distance} \cdot \sqrt{f_{GHz}} &= \frac{5}{5} \cdot \sqrt{2.48} \\ &= 1.57 \end{aligned}$$

$$1.57 \leq 7.5 \quad (\text{for 10-g SAR})$$

10-g ANT/ANT+ SAR is Exempt per FCC KDB 447498 D01 v06.



3.2. ISED SAR Test Exemption

Per RSS-102 Section 6.3, SAR evaluation for general population exposure conditions, by measurement or numerical simulation, is not required when... *test separation distances* ≤ 20 cm, the **1-g SAR test exclusion “numeric thresholds”**:

Frequency (MHz)	≤ 5 mm (mW)
2450	3

Note: For 10-g SAR, the exemption limits above are multiplied by a factor of 2.5

The worst case between the conducted and EIRP was used to determine the SAR exclusion.

For ANT/ANT+, 5.0 dBm + 2 dB = 7.0 dBm = 5 mW

$$5.0 \leq 7.5 \quad (\text{for 10-g SAR})$$

10-g ANT/ANT+ SAR is Exempt per RSS-102.

4. SAR Data Referencing

4.1. FCC SAR Data Referencing

Table 4-1

Exposure Condition	Band/Mode	Antenna	DUT SN	Power Drift [dB]	Maximum Duty Cycle [%]	Measured Duty Cycle [%]	Frequency [MHz]	Channel	Modulation/Configuration	RB/Tone Size or Data Rate [Mbps]	RB/Tone Offset or # of Tx slots, or BW [MHz]	Maximum Allowed Power [dBm]	Measured Conducted Power [dBm]	Separation Distance [mm]	Position	Measured 1g SAR [W/kg]	Reported 1g SAR [W/kg]	Measured 10g SAR [W/kg]	Reported 10g SAR [W/kg]	Reference Model Reported 1g SAR [W/kg]	Reference Model Reported 10g SAR [W/kg]	TERv	TERv	dTER	M	dTERmax	Reuse Verdict	Test Plot
Head	2.4 GHz Bluetooth	2.4 GHz	00003	-0.10	100.0%	100.0%	2402	0	FHSS	N/A	N/A	14.00	13.45	10	Front	0.024	0.027	-	-	0.031	-	0.029	0.027	0.33	0.38	0.52	OK	2
Extremity	2.4 GHz WiFi	2.4 GHz	00003	-0.03	100.0%	100.0%	2462	11	IEEE 802.11b - 22 MHz	1	22	20.00	18.55	0	Back	-	-	0.180	0.251	-	0.322	0.081	0.063	0.22	0.79	0.36	OK	-

4.2. ISED SAR Data Referencing

Table 4-2

Exposure Condition	Band/Mode	Antenna	DUT SN	Power Drift [dB]	Maximum Duty Cycle [%]	Measured Duty Cycle [%]	Frequency [MHz]	Channel	Modulation/Configuration	RB/Tone Size or Data Rate [Mbps]	RB/Tone Offset or # of Tx slots, or BW [MHz]	Maximum Allowed Power [dBm]	Measured Conducted Power [dBm]	Separation Distance [mm]	Position	Measured 1g SAR [W/kg]	Reported 1g SAR [W/kg]	Measured 10g SAR [W/kg]	Reported 10g SAR [W/kg]	Reference Model Reported 1g SAR [W/kg]	Reference Model Reported 10g SAR [W/kg]	Deviation [%]	Reuse Verdict	Test Plot
Head	2.4 GHz Bluetooth	2.4 GHz	00003	-0.10	100.0%	100.0%	2402	0	FHSS	N/A	N/A	14.00	13.45	10	Front	0.024	0.027	-	-	0.031	-	-12.90	OK	2
Extremity	2.4 GHz WiFi	2.4 GHz	00003	-0.03	100.0%	100.0%	2462	11	IEEE 802.11b - 22 MHz	1	22	20.00	18.55	0	Back	-	-	0.180	0.251	-	0.322	-22.05	OK	-



5. DUT SAR Test Results

5.1. NFC SAR Data

Table 5-1

Exposure Condition	Band/Mode	Antenna	DUT SN	Power Drift [dB]	Frequency [MHz]	Data Rate	Signal Type	Separation Distance [mm]	Position	Measured 10g SAR [W/kg]	Reported 10g SAR [W/kg]	Test Plot
Extremity	NFC	NFC	00003	-0.15	13.56	106k	Type A	0	Back	0.000	0.000	3

5.2. Additional Watch Straps SAR Data

Table 5-2

Exposure Condition	Band/Mode	Antenna	Additional Information	DUT SN	Power Drift [dB]	Maximum Duty Cycle [%]	Measured Duty Cycle [%]	Frequency [MHz]	Channel	Modulation/Configuration	Data Rate [Mbps]	RB Offset	Maximum Allowed Power [dBm]	Measured Conducted Power [dBm]	Separation Distance [mm]	Position	Measured 10g SAR [W/kg]	Reported 10g SAR [W/kg]	Test Plot
Extremity	2.4 GHz WiFi	2.4 GHz	Heathered Black Nylon Strap	00003	0.02	100.0%	100.0%	2462	11	IEEE 802.11b - 22 MHz	1	22	20.00	18.55	0	Back	0.190	0.265	1
Extremity	2.4 GHz WiFi	2.4 GHz	Vented Titanium Strap	00003	-0.03	100.0%	100.0%	2462	11	IEEE 802.11b - 22 MHz	1	22	20.00	18.55	0	Back	0.111	0.135	-

Exposure Condition	Band/Mode	Antenna	Additional Information	DUT SN	Power Drift [dB]	Maximum Duty Cycle [%]	Measured Duty Cycle [%]	Frequency [MHz]	Channel	Modulation/Configuration	Maximum Allowed Power [dBm]	Measured Conducted Power [dBm]	Separation Distance [mm]	Position	Measured 1g SAR [W/kg]	Reported 1g SAR [W/kg]	Test Plot
Head	2.4 GHz Bluetooth	2.4 GHz	Heathered Black Nylon Strap	00003	0.11	100.0%	100.0%	2402	0	FHSS	14.00	13.45	10	Front	0.015	0.017	-
Head	2.4 GHz Bluetooth	2.4 GHz	Vented Titanium Strap	00003	0.11	100.0%	100.0%	2402	0	FHSS	14.00	13.45	10	Front	0.010	0.011	-

5.3. General SAR Testing Notes:

1. The test data reported are the worst-case SAR values according to test procedures specified in IEEE 1528-2013 and FCC KDB Publication 447498 D04v01 for FCC.
2. The test data reported are the worst-case SAR values according to test procedures specified in IEC/IEEE 62209-1528 and RSS-102.SAR.MEAS for ISED.
3. Per IEC/IEEE 62209-1528, SAR testing was performed using probes calibrated for the modulation specific signal.
4. SAR evaluations were made in accordance with the latest version of RSS-102 Issue 6 and RSS-102.SAR.MEAS, then IEC/IEEE 62209-1528. FCC KDB Publications listed in RSS-102 can be used as supplementary procedures due to limitation of technology specific testing protocols in the international standards.
5. Liquid tissue depth was at least 15.0 cm for all frequencies.
6. SAR results were scaled to the maximum allowed power to demonstrate compliance per FCC KDB Publication 447498 D04v01.
7. Batteries are fully charged at the beginning of the SAR measurements.
8. When 10g SAR measurement is considered, a factor of 2.5 is applied to the thresholds below.
9. Since this device is a portable wrist-worn device and does not support any other use conditions, the procedures in FCC KDB Publication 447498 D04v01 section 5.2 have been applied for extremity and next to mouth (head) condition.



10. Since WIFI and NFC only support data transmission, SAR was evaluated for extremity only.
11. All SAR tests were performed with default Silicone strap. The worst-case reported SAR for each exposure condition were additionally evaluated for Heathered Black Nylon strap and Vented Titanium strap.
12. Simultaneous transmission analysis is provided in Appendix E.

5.4. WLAN Notes:

1. Justification for test configurations for WLAN per KDB Publication 248227 D01v02r02 for 2.4 GHz WIFI operations, the initial test configuration was selected according to the 802.11 transmission modes with the highest maximum allowed powers. SAR for other 802.11 modes was not required due to the maximum allowed powers and the highest reported SAR.
2. 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 or all test channels were measured. When there are multiple untested channels having the same subsequent highest average RF output power, the channel with higher frequency is considered for SAR measurements.
3. The device was configured to transmit continuously at the required data rate, channel bandwidth and signal modulation, using the highest transmission duty factor supported by the test mode tools. The reported SAR was scaled to the 100% transmission duty factor to determine compliance. Procedures used to measure the duty factor are identical to that in the associated Part 15 test reports.
4. Per KDB Publication 248227 D01v02r02, channels 12 and 13 are not required for SAR testing when their maximum outpower is not higher than channel 1, 6 and 11.

5.5. Bluetooth Note:

1. The device was configured to transmit continuously at the required data rate and signal modulation, using the highest transmission duty factor supported by the test mode tools. Per October 2016 TCB Workshop Notes, the reported SAR was scaled to the 100.0% transmission duty factor for Bluetooth to determine compliance.

6. DUT SAR Measurement Variability Requirement

Per FCC KDB Publication 865664 D01v01r04, SAR measurement variability was not required since the measured SAR results for a frequency band were less than 0.8 W/kg for 1g SAR and 2.0 W/kg for 10g SAR.

7. General Introduction

Title 47 of the Code of Federal Regulations (CFR) pertains to United States Federal regulation for Telecommunications. The **Federal Communications Commission (FCC)** is the agency responsible for



implementing and enforcing these regulations. The rules define a **radiofrequency device** as any device which in its operation is capable of emitting radiofrequency energy by radiation, conduction, or other means.

47CFR §2.1093(b) states, “A **portable device** is defined as a transmitting device designed to be used in other than fixed locations and to generally be used in such a way that the RF source's radiating structure(s) **is/are within 20 centimeters of the body of the user.**”

Also, 47CFR §2.1093(d)(6) states, that General population/uncontrolled exposure limits defined in §1.1310 “apply to portable devices intended for use by consumers or persons who are exposed as a consequence of their employment and may not be fully aware of the potential for exposure or cannot exercise control over their exposure.”

47CFR §2.1093(d)(2) states that evaluation of compliance within FCC’s SAR limits can be demonstrated by laboratory measurements. This test report serves this purpose.

8. Background on Radiofrequency (RF) Exposure Limits

8.1. Controlled Environment

Controlled environments are defined as locations where the RF field intensities have been adequately characterized by means of measurement or calculation and exposure is incurred by persons who are: aware of the potential for RF field exposure, cognizant of the intensity of the RF fields in their environment, aware of the potential health risks associated with RF field exposure and able to control their risk using mitigation strategies. 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.

8.2. Uncontrolled Environment

Uncontrolled environments are defined as locations where either insufficient assessment of RF fields have been conducted or where persons who are allowed access to these areas have not received proper RF field awareness/safety training and have no means to assess or, if required, to mitigate their exposure to RF fields. The general population/uncontrolled exposure limits are applicable to situations in which the general public may be exposed, or in which persons who may not be made fully aware of the potential for exposure, or cannot exercise control over their exposure. Members of the general public would fall under



this category when exposure is not employment-related; for example, in the case of a wireless transmitter that exposes persons in its vicinity.

8.3. RF Exposure Limits for 100kHz – 6 GHz

Table 8-1 Human Exposure to RF Radiation Limits in 47 CFR §1.1310 and Health Canada Safety Code 6- SAR
Basic Restrictions for frequencies 100kHz ~ 6 GHz

Environment	Condition	SAR	Averaging volume
Uncontrolled / General Population	Head, Neck Trunk	1.6 W/kg	1g cube
	Extremity	4.0 W/kg	10g cube
Controlled	Head/Trunk	8 W/kg	1g cube
	Extremity / Limbs	20 W/kg	10g cube



9. RF Safety Laboratory SAR Measurement System

9.1. SAR Measurement Hardware and Software

Peak spatially averaged SAR (psSAR) measurements are performed using a DASY8 robot system with cDASY8 module SAR software. The DASY8 is made by SPEAG in Switzerland and consists of a 6-axis robot, robot controller, computer, dosimetric probe, probe alignment light beam unit, and various SAR phantoms.

9.2. E-Field Probe

Manufacturer	Schmid & Partner Engineering AG
Model	EX3DV4
Description	Smallest isotropic electric (E-) field probe for high precision specific absorption rate (SAR) measurements
Frequency Range	4 MHz - 10.0 GHz
Dynamic Range	10 μ W/g – >100 mW/g
Overall Length (mm)	337
Body Diameter (mm)	12
Tip Length (mm)	9
Tip Diameter (mm)	2.5
Probe Tip to Sensor X Calibration Point (mm)	1
Probe Tip to Sensor Y Calibration Point (mm)	1
Applications	High precision dosimetric measurements in any exposure scenario (e.g. very strong gradient fields); the only probe that enables compliance testing for frequencies up to 6 GHz with precision of better than 30%
Compatibility	DASY8 robot + cDASY8 module SAR software

9.3. Peak Spatially Averaged SAR (psSAR) Measurements

SAR Evaluations are performed using the following procedure compliant to FCC KDB Publication 865664 D01v01r04, IEEE 1528:2013 and IEC/IEEE 62209-1528:



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, IEEE 1528:2013 and IEC/IEEE 62209-1528.
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, IEEE 1528:2013 and IEC/IEEE 62209-1528. 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 the area scan and zoomscan resolutions specified in FCC KDB Publication 865664 D01v01r04 section 2.7.1, IEEE 1528:2013 table 6, and IEC/IEEE 62209-1528 table 3 & table 4. 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.
 - d. The zoom scan is confirmed to meet both of the following parameters if the result is $> 0.1 \text{ W/kg}$. If the result does not meet the below parameters, it is re-measured with a finer resolution scan until the below parameters are met.
 - (1) The smallest horizontal distance from the local SAR peaks to all points 3 dB below the SAR peak shall be larger than the horizontal grid steps in both x- and y-directions.
 - (2) The ratio of the SAR at the second measured point (M2) to the SAR at the closest measured point (M1) at the x-y location of the measured maximum SAR value shall be at least 30%
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.



9.4. Test Positions

9.4.1. 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 $\delta = 0.02$.

9.4.2. Head Exposure Configurations

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

9.4.3. Extremity Exposure Configurations

Devices that are designed or intended for use on extremities or mainly operated in extremity only exposure conditions; i.e., hands, wrists, feet and ankles, may require extremity SAR evaluation. When the device also operates in close proximity to the user's body, SAR compliance for the body is also required. The 1g body and 10g extremity SAR Exclusion Thresholds found in KDB Publication 447498 D04v01 and RSS-102 should be applied to determine SAR test requirements.



9.5. RF Safety Laboratory SAR System Measurement Uncertainty

SAR Uncertainty for DUTs According to 62209-1528										
(Frequencies: 4 MHz - 3 GHz)										
Symbol	Input Quantity (Xi) (Source of Uncertainty)	62209-1528 Ref	Unc. (xi)	Prob. Dist. PDFi	Div(qi)	ci (1g)	ci (10g)	Std Unc (1g)	Std. Unc (10g)	vi
Measurement System Errors										
CF	Probe Calibration	8.4.1.1	13.3%	N (k=2)	2	1	1	6.65%	6.7%	∞
CFdrift	Probe Calibration Drift	8.4.1.2	1.7%	R	√3	1	1	1.0%	1.0%	∞
LIN	Probe Linearity and Detection Limit	8.4.1.3	4.7%	R	√3	1	1	2.7%	2.7%	∞
BBS	Broadband Signal	8.4.1.4	2.8%	R	√3	1	1	1.6%	1.6%	∞
ISO	Probe Isotropy	8.4.1.5	7.6%	R	√3	1	1	4.4%	4.4%	∞
DAE	Other probe and data acquisition errors	8.4.1.6	0.8%	N	1	1	1	0.8%	0.8%	∞
AMB	RF Ambient and Noise	8.4.1.7	1.8%	N	1	1	1	1.8%	1.8%	∞
Δxyz	Probe Positioning Errors	8.4.1.8	0.006 mm	N	1	0.14	0.14	0.1%	0.1%	∞
DAT	Data Processing Errors	8.4.1.9	1.2%	N	1	1	1	1.2%	1.2%	∞
Phantom and Device Errors										
LIQ(σ)	Measurement of Phantom Conductivity	8.4.2.1	2.5%	N	1	0.78	0.71	2.0%	1.8%	∞
LIQ(Tc)	Temperature Effects (Medium)	8.4.2.2	5.4%	R	√3	0.78	0.71	2.4%	2.2%	∞
EPS	Shell Permittivity	8.4.2.3	14.0%	R	√3	0	0	0.0%	0.0%	∞
DIS	Distance between the radiating element of the DUT and the phantom medium	8.4.2.4	2.0%	N	1	2	2	4.0%	4.0%	∞
Dxyz	Repeatability of Positioning the DUT or source against the phantom	8.4.2.5	1.0%	N	1	1	1	1.0%	1.0%	5
H	Device Holder Effects	8.4.2.6	3.6%	N	1	1	1	3.6%	3.6%	8
MOD	Effect of Operating mode on probe sensitivity	8.4.2.7	2.4%	R	√3	1	1	1.4%	1.4%	∞
RFdrift	Variation in SAR due to Drift in output of DUT	8.4.2.9	2.5%	N	1	1	1	2.5%	2.5%	∞
VAL	Validation Antenna Uncertainty (Validation measurement only)	8.4.2.10	0.0%	N	1	1	1	0.0%	0.0%	∞
Pin	Uncertainty in Accepted Power (Validation Measurement only)	8.4.2.11	0.0%	N	1	1	1	0.0%	0.0%	∞
Correction to the SAR Results										
C(ε',σ)	Phantom Deviation from Target (ε',σ)	8.4.3.1	1.9%	N	1	1	0.84	1.9%	1.6%	∞
C(R)	SAR Scaling	8.4.3.2	0.0%	R	√3	1	1	0.0%	0.0%	∞
u(ΔS AR)	Combined Uncertainty							11.5%	11.3%	∞
U	Expanded Uncertainty and Effective Degrees of Freedom (k=2)							22.9%	22.7%	

10. Technology Specific Test Setup Requirements

10.1. Measured and Reported SAR

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



reported SAR results are identified on the grant of equipment authorization according to procedures in KDB 690783 D01v01r03.

10.2. Procedures Used to Establish RF Signal for SAR

Devices under test are evaluated prior to testing, with a fully charged battery and were configured to operate at maximum output power. In order to verify that the device is tested throughout the SAR test at maximum output power, the SAR measurement system measures a “point SAR” at an arbitrary reference point at the start and end of the 1 gram and 10 gram SAR evaluation, to assess for any power drifts during the evaluation.

10.3. 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.

10.3.1. 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% duty factor to determine compliance at the maximum tune-up tolerance limit.

10.3.2. Initial Test Position Procedure

The test position with the highest extrapolated (peak) SAR is used as the initial test position. When reported SAR for the initial test position is ≤ 0.4 W/kg, no additional testing for the remaining test positions is required. Otherwise, SAR is evaluated at the subsequent highest peak SAR positions until the reported SAR result is ≤ 0.8 W/kg or all test positions are measured. When 10g SAR measurement is considered, a factor of 2.5 is applied to the thresholds above.



10.3.3. 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. 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.

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.



11. Equipment List

Manufacturer	Model	Description	Serial Number	Calibration Date	Calibration Due	CBT
Amplifier Research	551G4	RF Broadband Amplifier (800 MHz - 4.2 GHz)	331258	-	-	✓
Rohde & Schwarz	SMCV100B	R&S SMCV100B Vector Signal Generator (VSG)	103882	12/30/2025	12/30/2027	-
SPEAG	Powersource1	Signal Generator	4341	1/6/2026	1/6/2027	-
Anritsu	MA24118A	Microwave USB Power Sensor (10MHz - 18 GHz)	2123431	1/22/2026	1/22/2027	-
Anritsu	MA24118A	Microwave USB Power Sensor (10MHz - 18 GHz)	2123500	1/22/2026	1/22/2027	-
Rohde & Schwarz	NRP8S	Power Sensor 10 MHz - 8 GHz	114184	3/12/2026	3/12/2027	-
Rohde & Schwarz	NRP8S	Power Sensor 10 MHz - 8 GHz	114183	3/12/2026	3/12/2027	-
Rohde & Schwarz	NRP8S	Power Sensor 10 MHz - 8 GHz	114343	4/1/2026	4/1/2027	-
Anritsu	S820E	Vector Network Analyzer	2348026	1/13/2026	1/13/2028	-
Control Company	4040	Ambient Thermometer	250440190	7/17/2025	7/17/2027	-
Control Company	4040	Ambient Thermometer	250440191	7/17/2025	7/17/2027	-
Control Company	4040	Ambient Thermometer	250440199	7/17/2025	7/17/2027	-
Control Company	4352	Long Stem Liquid Thermometer	250257657	4/23/2025	4/23/2027	-
Control Company	4352	Long Stem Liquid Thermometer	250257660	4/23/2025	4/23/2027	-
Control Company	4352	Long Stem Liquid Thermometer	250257665	4/23/2025	4/23/2027	-
Micro-Coax	UFB205A-0-0240-30x30	SMA M-F RF test Cable (DC - 18 GHz)	-	-	-	✓
Mini-Circuits	BW-N20W20+	20dB RF Fixed Attenuator (DC - 18 GHz)	-	-	-	✓
Mini-Circuits	BW-N20W20+	20dB RF Fixed Attenuator (DC - 18 GHz)	-	-	-	✓
Mini-Circuits	BW-S3W2+	3dB RF Fixed Attenuator (DC - 18 GHz)	-	-	-	✓
Mini-Circuits	BW-S3W2+	3dB RF Fixed Attenuator (DC - 18 GHz)	-	-	-	✓
Mini-Circuits	CBL-6FT-SMNM+	Precision Test Cable SMA/N (DC - 18 GHz)	3318	-	-	✓
Mini-Circuits	CBL-6FT-SMNM+	Precision Test Cable SMA/N (DC - 18 GHz)	3335	-	-	✓
Mini-Circuits	CBL-6FT-SMNM+	Precision Test Cable SMA/N (DC - 18 GHz)	3329	-	-	✓
Mini-Circuits	NF-SF50+	RF Adapter N Male to SMA Female (DC - 18 GHz)	-	-	-	✓
Mini-Circuits	VLF-3000+	Coaxial Low Pass Filter (DC - 3 GHz)	-	-	-	✓
Narda	24785-20	20 dB SMA Fixed Attenuator (DC - 4.0 GHz)	-	-	-	✓
Narda	4226-20 (26733)	20 dB SMA Directional Coupler (0.5 - 18 GHz)	201	-	-	✓
Mitutoyo	CD-4"AX	Digital Caliper	B23243217	8/28/2025	8/28/2027	-
SPEAG	DAK-12	DAK-12 Dielectric Probe	1194	10/10/2025	10/10/2026	-
SPEAG	DAK-3.5	DAK-3.5 Dielectric Probe	1349	8/5/2025	8/5/2026	-
Speag	CLA13	CLA-13 Confined Loop Antenna	1041	10/11/2024	10/11/2026	-
Speag	D2450V2	D2450V2 System Validation Dipole	1112	11/15/2024	11/15/2026	-
SPEAG	DAE4ip	Data Acquisition Electronics with Integ. Power	1843	7/30/2025	7/30/2026	-
SPEAG	DAE4ip	Data Acquisition Electronics with Integ. Power	1933	1/7/2026	1/7/2027	-
SPEAG	DAE4ip	Data Acquisition Electronics with Integ. Power	1838	12/4/2025	12/4/2026	-
SPEAG	EX3DV4	SAR Measurement Probe	7872	8/8/2025	8/8/2026	-
SPEAG	EX3DV4	SAR Measurement Probe	7969	1/13/2026	1/13/2027	-
SPEAG	EX3DV4	SAR Measurement Probe	7857	12/9/2025	12/9/2026	-
SPEAG	SE UMS 171 E	MAIA Modulation and Interference Analyzer	1814	-	-	-
SPEAG	SE UMS 171 E	MAIA Modulation and Interference Analyzer	1817	-	-	-
SPEAG	SE UMS 171 EA	MAIA Modulation and Interference Analyzer	1820	-	-	-
SPEAG	SE UMS 176 C	ANT Wideband Communication Antenna	1579	-	-	-
SPEAG	SE UMS 176 C	ANT Wideband Communication Antenna	1601	-	-	-
SPEAG	SE UMS 176 C	ANT Wideband Communication Antenna	1610	-	-	-

✓Note: Components calibrated before testing. Prior to testing, the measurement paths containing a cable, attenuator, coupler or filter were connected to a calibrated source (i.e. a signal generator, power sensor, or VNA) 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.



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12. Conclusion

The SAR evaluation indicates that the DUT is capable of compliance with the RF radiation exposure limits of the FCC and ISED, 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.