

FCC SAR TEST REPORT

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Product Name: AX900 Wi-Fi 6 Wireless USB Adapter

FCC ID: V7TU11V1

Standard(s): 47 CFR Part 2(2.1093)

Report Number: DG2240321-14598E-20

Report Date: 2024/04/25

The above device has been tested and found compliant with the requirement of the relative standards by Bay Area Compliance Laboratories Corp. (Dongguan).

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SAR TEST RESULTS SUMMARY

Mode		Max. Reported SAR Level(s) (W/kg)	Limit (W/kg)
Wi-Fi 2.4G	1g Body SAR	0.87	1.6
Wi-Fi 5.2G	1g Body SAR	0.33	
Wi-Fi 5.8G	1g Body SAR	1.04	
Applicable Standards	FCC 47 CFR part 2.1093 Radiofrequency radiation exposure evaluation: portable devices		
	IEEE1528:2013 IEEE Recommended Practice for Determining the Peak Spatial-Average Specific Absorption Rate (SAR) in the Human Head from Wireless Communications Devices: Measurement Techniques		
	IEC 62209-2:2010 Human exposure to radio frequency fields from hand-held and body-mounted wireless communication devices-Human models, instrumentation, and procedures-Part 2: Procedure to determine the specific absorption rate (SAR) for wireless communication devices used in close proximity to the human body (frequency range of 30 MHz to 6 GHz)		
	IEC 62209-2:2010/AMD1:2019 Amendment 1 - Human exposure to radio frequency fields from hand-held and body-mounted wireless communication devices - Human models, instrumentation, and procedures - Part 2: Procedure to determine the specific absorption rate (SAR) for wireless communication devices used in close proximity to the human body (frequency range of 30 MHz to 6 GHz)		
	KDB procedures KDB 447498 D01 General RF Exposure Guidance v06 KDB 447498 D02 SAR Procedures for Dongle Xmtr KDB 865664 D01 SAR Measurement 100 MHz to 6 GHz v01r04 KDB 865664 D02 RF Exposure Reporting v01r02 KDB 248227 D01 802.11 Wi-Fi SAR v02r02		
	Note: This wireless device has been shown to be capable of compliance for localized specific absorption rate (SAR) for General Population/Uncontrolled Exposure limits specified in FCC 47 CFR part 2.1093 and has been tested in accordance with the measurement procedures specified in IEEE 1528-2013 and RF exposure KDB procedures. The results and statements contained in this report pertain only to the device(s) evaluated.		

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DOCUMENT REVISION HISTORY

Revision Number	Report Number	Description of Revision	Date of Revision
1.0	DG2240321-14598E-20	Original Report	2024/04/25

1. GENERAL INFORMATION

1.1 Product Description for Equipment under Test (EUT)

EUT Name:	AX900 Wi-Fi 6 Wireless USB Adapter
EUT Model:	U11
Device Type:	Portable
Exposure Category:	Population / Uncontrolled
Antenna Type(s):	Internal Antenna
Body-Worn Accessories:	None
Proximity Sensor:	None
Carrier Aggregation:	None
Operation Modes:	WLAN
Operation Frequency:	WLAN 2.4G: 2412-2462 MHz/2422MHz-2452 MHz(TX/RX) WLAN 5.2G: 5150 -5250 MHz(TX/RX) WLAN 5.8G: 5725-5850 MHz(TX/RX)
Maximum Output Power (Conducted):	WLAN 2.4G: 17.29 dBm; WLAN 5.2G: 16.97 dBm; WLAN 5.8G: 17.11 dBm
Rated Input Voltage:	DC 5V from USB Host
Serial Number:	2J0L-1
Normal Operation:	Close to Body
EUT Received Date:	2024/03/23
Test Date:	2024/04/19 ~ 2024/04/20
EUT Received Status:	Good

2. REFERENCE, STANDARDS, AND GUIDELINES

FCC:

The Report and Order requires routine SAR evaluation prior to equipment authorization of portable transmitter devices, including portable telephones. For consumer products, the applicable limit is 1.6 mW/g as recommended by the ANSI/IEEE standard C95.1-1992 [6] for an uncontrolled environment (Paragraph 65). According to the Supplement C of OET Bulletin 65 "Evaluating Compliance with FCC Guide-lines for Human Exposure to Radio frequency Electromagnetic Fields", released on Jun 29, 2001 by the FCC, the device should be evaluated at maximum output power (radiated from the antenna) under "worst-case" conditions for normal or intended use, incorporating normal antenna operating positions, device peak performance frequencies and positions for maximum RF energy coupling.

This report describes the methodology and results of experiments performed on wireless data terminal. The objective was to determine if there is RF radiation and if radiation is found, what is the extent of radiation with respect to safety limits. SAR (Specific Absorption Rate) is the measure of RF exposure determined by the amount of RF energy absorbed by human body (or its parts) – to determine how the RF energy couples to the body or head which is a primary health concern for body worn devices. The limit below which the exposure to RF is considered safe by regulatory bodies in North America is 1.6 mW/g average over 1 gram of tissue mass.

2.1 SAR Limits

FCC Limit

EXPOSURE LIMITS	SAR (W/kg)	
	(General Population / Uncontrolled Exposure Environment)	(Occupational / Controlled Exposure Environment)
Spatial Average (averaged over the whole body)	0.08	0.4
Spatial Peak (averaged over any 1 g of tissue)	1.60	8.0
Spatial Peak (hands/wrists/feet/ankles averaged over 10 g)	4.0	20.0

Population/Uncontrolled Environments are defined as locations where there is the exposure of individual who have no knowledge or control of their exposure.

Occupational/Controlled Environments are defined as locations where there is exposure that may be incurred by people who are aware of the potential for exposure (i.e. as a result of employment or occupation).

General Population/Uncontrolled environments Spatial Peak limit 1.6W/kg (FCC) applied to the EUT.

2.2 Test Facility

The Test site used by Bay Area Compliance Laboratories Corp. (Dongguan) to collect test data is located on the No.12, Pulong East 1st Road, Tangxia Town, Dongguan, Guangdong, China.

The lab has been recognized as the FCC accredited lab under the KDB 974614 D01 and is listed in the FCC Public Access Link (PAL) database, FCC Registration No. : 829273, the FCC Designation No. : CN5044.

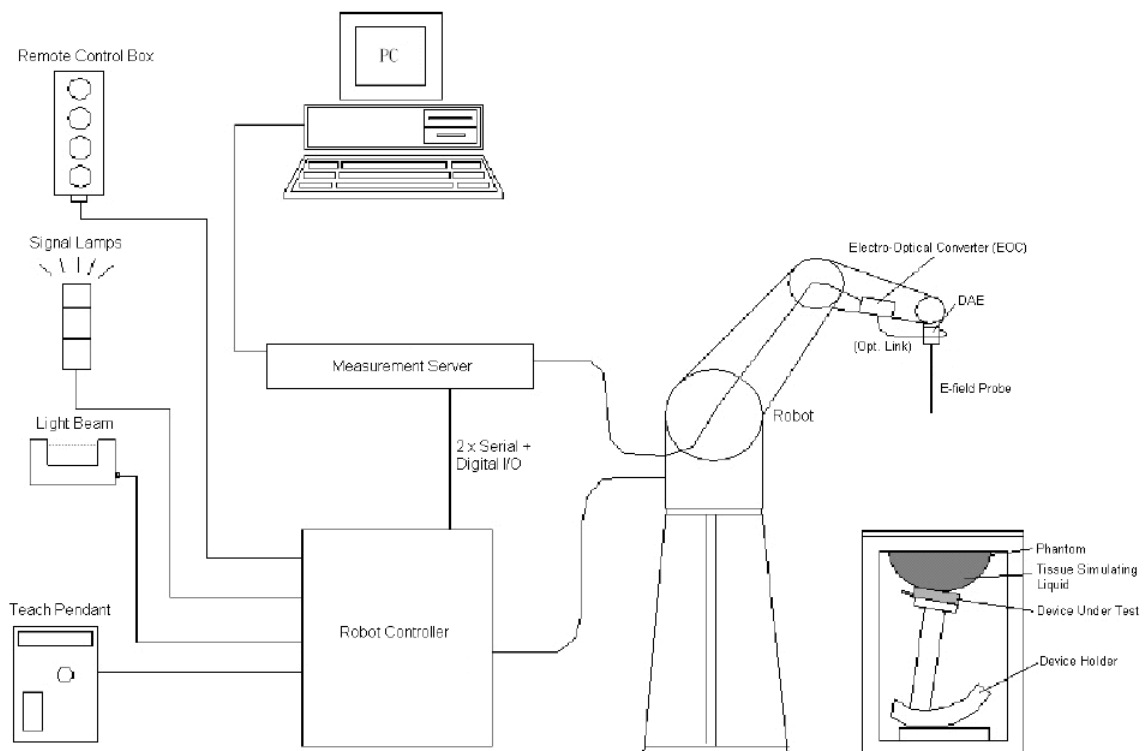
3. DESCRIPTION OF TEST SYSTEM

These measurements were performed with the automated near-field scanning system DASY5 from Schmid & Partner Engineering AG (SPEAG) which is the Fifth generation of the system shown in the figure hereinafter:



DASY5 System Description

The DASY5 system 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 application, 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 Win7 professional operating system and the DASY52 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.

DASY5 Measurement Server

The DASY5 measurement server is based on a PC/104 CPU board with a 400MHz Intel ULV Celeron, 128MB chip-disk and 128MB RAM. The necessary circuits for communication with the DAE4 (or DAE3) electronics box, as well as the 16 bit AD-converter system for optical detection and digital I/O interface are contained on the DASY5 I/O board, which is directly connected to the PC/104 bus of the CPU board.

The measurement server performs all real-time data evaluation of field measurements and surface detection, controls robot movements and handles safety operation. The PC operating system cannot interfere with these time critical processes. All connections are supervised by a watchdog, and disconnection of any of the cables to the measurement server will automatically disarm the robot and disable all program-controlled robot movements. Furthermore, the measurement server is equipped with an expansion port which is reserved for future applications. Please note that this expansion port does not have a standardized point out, and therefore only devices provided by SPEAG can be connected. Devices from any other supplier could seriously damage the measurement server.



Data Acquisition Electronics

The data acquisition electronics (DAE4) consist of a highly sensitive electrometer-grade preamplifier with auto-zeroing, a channel and gain-switching multiplexer, a fast 16 bit AD-converter and a command decoder with a control logic unit. Transmission to the measurement server is accomplished through an optical downlink for data and status information, as well as an optical uplink for commands and the clock.

The mechanical probe mounting device includes two different sensor systems for frontal and sideways probe contacts. They are used for mechanical surface detection and probe collision detection.

The input impedance of both the DAE4 as well as of the DAE3 box is 200M Ω ; the inputs are symmetrical and floating. Common mode rejection is above 80 dB.

EX3DV4 E-Field Probes

Frequency	4 MHz – 10 GHz Linearity: ± 0.2 dB (30 MHz – 10 GHz)
Directivity(typical)	± 0.1 dB in TSL (rotation around probe axis) ± 0.3 dB in TSL (rotation normal to probe axis)
Dynamic Range	10 μ W/g – > 100 mW/g Linearity: ± 0.2 dB (noise: typically < 1 μ W/g)
Dimensions	Overall length: 337 mm (tip: 20 mm) Tip diameter: 2.5 mm (body: 12 mm) Typical distance from probe tip to dipole centers: 1 mm
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 30%.
Compatibility	DASY3, DASY4, DASY52, DASY6, DASY8, EASY6, EASY4/MRI

SAM Twin Phantom

The SAM twin phantom is a fiberglass shell phantom with 2mm shell thickness (except the ear region, where shell thickness

increases to 6 mm). The phantom has three measurement areas:

- _ Left Head
- _ Right Head
- _ Flat phantom

The phantom table for the DASY systems based on the robots have the size of 100 x 50 x 85 cm (L x W x H). For easy dislocation these tables have fork lift cut outs at the bottom.

The bottom plate contains three pairs of bolts for locking the device holder. The device holder positions are adjusted to the standard measurement positions in the three sections. Only one device holder is necessary if two phantoms are used (e.g., for different liquids)



A white cover is provided to cover the phantom during off-periods to prevent water evaporation and changes in the liquid parameters. Free space scans of devices on top of this phantom cover are possible. Three reference marks are provided on the phantom counter. These reference marks are used to teach the absolute phantom position relative to the robot.

Robots

The DASY5 system uses the high precision industrial robot. The robot offers the same features important for our application:

- High precision (repeatability 0.02mm)
- High reliability (industrial design)
- Low maintenance costs (virtually maintenance free due to direct drive gears; no belt drives)
- Jerk-free straight movements (brushless synchrony motors; no stepper motors)
- Low ELF interference (motor control fields shielded via the closed metallic construction shields)

The above mentioned robots are controlled by the Staubli CS7MB robot controllers. All information regarding the use and maintenance of the robot arm and the robot controller is contained on the CDs delivered along with the robot. Paper manuals are available upon request direct from Staubli.

Area Scans

Area scans are defined prior to the measurement process being executed with a user defined variable spacing between each measurement point (integral) allowing low uncertainty measurements to be conducted. Scans defined for FCC applications utilize a 15mm 2 step integral, with 1.5mm interpolation used to locate the peak SAR area used for zoom scan assessments.

Where the system identifies multiple SAR peaks (which are within 25% of peak value) the system will provide the user with the option of assessing each peak location individually for zoom scan averaging.

Zoom Scan (Cube Scan Averaging)

The averaging zoom scan volume utilized in the DASY5 software is in the shape of a cube and the side dimension of a 1 g or 10 g mass is dependent on the density of the liquid representing the simulated tissue. A density of 1000 kg/m^3 is used to represent the head and body tissue density and not the phantom liquid density, in order to be consistent with the definition of the liquid dielectric properties, i.e. the side length of the 1g cube is 10mm, with the side length of the 10g cube is 21.5mm.

When the cube intersects with the surface of the phantom, it is oriented so that 3 vertices touch the surface of the shell or the center of a face is tangent to the surface. The face of the cube closest to the surface is modified in order to conform to the tangent surface.

The zoom scan integer steps can be user defined so as to reduce uncertainty, but normal practice for typical test applications (including FCC) utilize a physical step of 7 x7 x 7 (5mmx5mmx5mm) providing a volume of 30 mm in the X & Y & Z axis.

Tissue Dielectric Parameters for Head and Body Phantoms

The head tissue dielectric parameters recommended by the IEC 62209-1:2016

Recommended Tissue Dielectric Parameters for Head liquid

Table A.3 – Dielectric properties of the head tissue-equivalent liquid

Frequency MHz	Relative permittivity ϵ_r	Conductivity (σ) S/m
300	45,3	0,87
450	43,5	0,87
750	41,9	0,89
835	41,5	0,90
900	41,5	0,97
1 450	40,5	1,20
1 500	40,4	1,23
1 640	40,2	1,31
1 750	40,1	1,37
1 800	40,0	1,40
1 900	40,0	1,40
2 000	40,0	1,40
2 100	39,8	1,49
2 300	39,5	1,67
2 450	39,2	1,80
2 600	39,0	1,96
3 000	38,5	2,40
3 500	37,9	2,91
4 000	37,4	3,43
4 500	36,8	3,94
5 000	36,2	4,45
5 200	36,0	4,66
5 400	35,8	4,86
5 600	35,5	5,07
5 800	35,3	5,27
6 000	35,1	5,48

NOTE For convenience, permittivity and conductivity values at those frequencies which are not part of the original data provided by Drossos et al. [33] or the extension to 5 800 MHz are provided (i.e. the values shown *in italics*). These values were linearly interpolated between the values in this table that are immediately above and below these values, except the values at 6 000 MHz that were linearly extrapolated from the values at 3 000 MHz and 5 800 MHz.

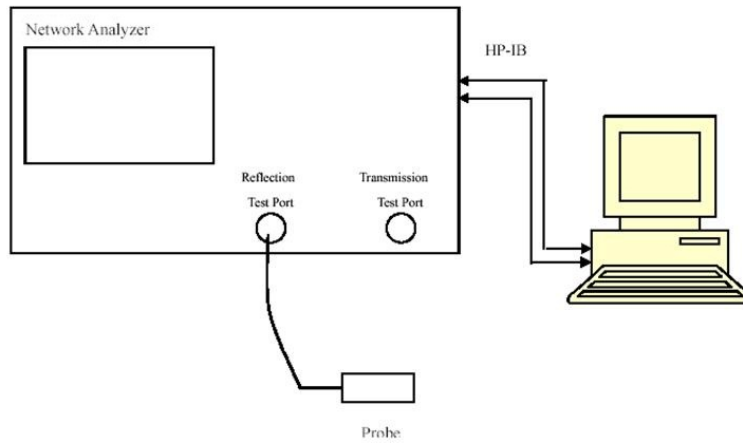
4. EQUIPMENT LIST AND CALIBRATION

4.1 Equipments List & Calibration Information

Equipment	Model	S/N	Calibration Date	Calibration Due Date
DASY5 Test Software	DASY52.10	N/A	NCR	NCR
DASY5 Measurement Server	DASY5 4.5.12	1470	NCR	NCR
Data Acquisition Electronics	DAE4	772	2024/1/23	2025/1/22
E-Field Probe	EX3DV4	7839	2023/9/21	2024/9/20
Mounting Device	MD4HHTV5	SD 000 H01 KA	NCR	NCR
Twin SAM	Twin SAM V5.0	1874	NCR	NCR
Dipole, 2450 MHz	D2450V2	971	2021/6/28	2024/6/27
Dipole, 5 GHz	D5GHzV2	1246	2022/11/1	2025/10/31
Simulated Tissue Liquid Head	HBBL600-10000V6	SL AAH U16 BC (Batch:220809-1)	Each Time	/
Network Analyzer	8753C	3033A02857	2023/11/18	2024/11/17
Dielectric assessment kit	1253	SM DAK 040 CA	NCR	NCR
synthesized signal generator	8665B	3438a00584	2023/10/18	2024/10/17
EPM Series Power Meter	E4419B	MY45103907	2023/10/18	2024/10/17
Power Amplifier	ZHL-5W-202-S+	416402204	NCR	NCR
Power Amplifier	ZVE-6W-83+	637202210	NCR	NCR
Directional Coupler	441493	520Z	NCR	NCR
Attenuator	20dB, 100W	LN749	NCR	NCR
Attenuator	6dB, 150W	2754	NCR	NCR
Thermometer	DTM3000	3635	2023/8/11	2024/8/10
Hygrothermograph	HTC-2	EM072	2023/11/6	2024/11/5

5. SAR MEASUREMENT SYSTEM VERIFICATION

5.1 Liquid Verification



5.2 Liquid Verification Results

Frequency (MHz)	Liquid Type	Liquid Parameter		Target Value		Delta (%)		Tolerance (%)
		ϵ_r	σ (S/m)	ϵ_r	σ (S/m)	$\Delta\epsilon_r$	$\Delta\sigma$ (S/m)	
2412	Simulated Tissue Liquid Head	40.454	1.796	39.28	1.77	2.99	1.47	± 5
2437	Simulated Tissue Liquid Head	40.372	1.824	39.23	1.79	2.91	1.9	± 5
2450	Simulated Tissue Liquid Head	40.341	1.839	39.2	1.8	2.91	2.17	± 5
2462	Simulated Tissue Liquid Head	40.301	1.853	39.18	1.81	2.86	2.38	± 5

*Liquid Verification above was performed on 2024/04/20.

Frequency (MHz)	Liquid Type	Liquid Parameter		Target Value		Delta (%)		Tolerance (%)
		ϵ_r	σ (S/m)	ϵ_r	σ (S/m)	$\Delta\epsilon_r$	$\Delta\sigma$ (S/m)	
5180	Simulated Tissue Liquid Head	35.962	4.651	36.02	4.64	-0.16	0.24	± 5
5200	Simulated Tissue Liquid Head	35.586	4.686	36	4.66	-1.15	0.56	± 5
5240	Simulated Tissue Liquid Head	35.452	4.723	35.96	4.7	-1.41	0.49	± 5
5250	Simulated Tissue Liquid Head	35.304	4.719	35.95	4.71	-1.8	0.19	± 5

*Liquid Verification above was performed on 2024/04/20.

Frequency (MHz)	Liquid Type	Liquid Parameter		Target Value		Delta (%)		Tolerance (%)
		ϵ_r	σ (S/m)	ϵ_r	σ (S/m)	$\Delta\epsilon_r$	$\Delta\sigma$ (S/m)	
5745	Simulated Tissue Liquid Head	34.294	5.323	35.36	5.22	-3.01	1.97	± 5
5750	Simulated Tissue Liquid Head	34.115	5.356	35.35	5.22	-3.49	2.61	± 5
5785	Simulated Tissue Liquid Head	34.043	5.385	35.32	5.26	-3.62	2.38	± 5
5825	Simulated Tissue Liquid Head	34.971	5.398	35.28	5.3	-0.88	1.85	± 5

*Liquid Verification above was performed on 2024/04/19.

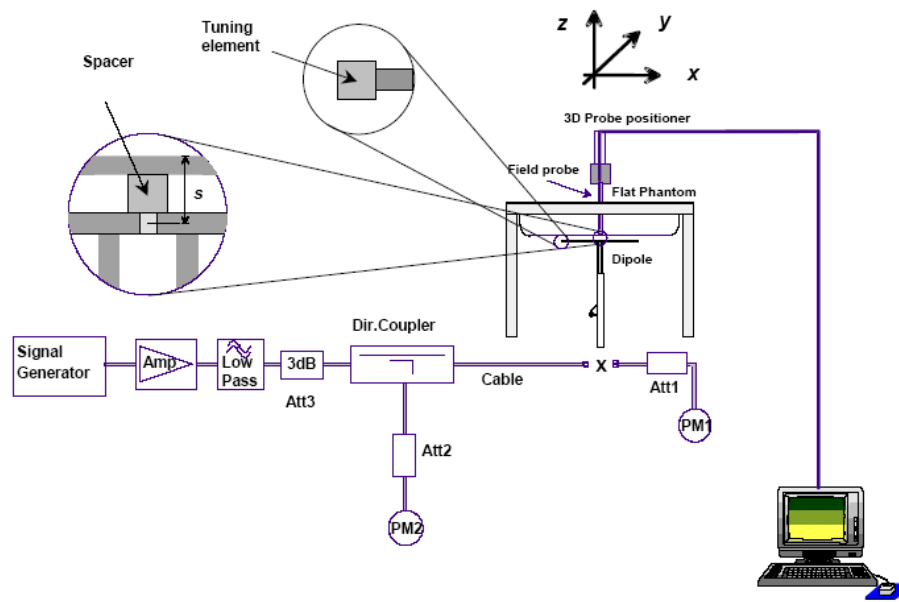
5.3 System Accuracy Verification

Prior to the assessment, the system validation kit was used to test whether the system was operating within its specifications of $\pm 10\%$. The validation results are tabulated below. And also the corresponding SAR plot is attached as well in the SAR plots files.

The spacing distances in the **System Verification Setup Block Diagram** is given by the following:

- $s = 15 \text{ mm} \pm 0,2 \text{ mm}$ for $300 \text{ MHz} \leq f \leq 1\,000 \text{ MHz}$;
- $s = 10 \text{ mm} \pm 0,2 \text{ mm}$ for $1\,000 \text{ MHz} < f \leq 3\,000 \text{ MHz}$;
- $s = 10 \text{ mm} \pm 0,2 \text{ mm}$ for $3\,000 \text{ MHz} < f \leq 6\,000 \text{ MHz}$.

System Verification Setup Block Diagram



5.4 System Accuracy Check Results

Date	Frequency Band	Liquid Type	Input Power (mW)	Measured SAR (W/kg)	Normalized to 1W (W/kg)	Target Value (W/kg)	Delta (%)	Tolerance (%)
2024/04/20	2450 MHz	Simulated Tissue Liquid Head	100	1g 4.92	49.2	53.5	-8.04	± 10
2024/04/20	5250 MHz	Simulated Tissue Liquid Head	100	1g 8.18	81.8	77.5	5.55	± 10
2024/04/19	5750 MHz	Simulated Tissue Liquid Head	100	1g 7.58	75.8	78.4	-3.32	± 10

*The SAR values above are normalized to 1 Watt forward power.

5.5 SAR SYSTEM VALIDATION DATA

System Performance 2450MHz Head

DUT: D2450V2; Type: 2450 MHz; Serial: 971

Communication System: CW; Frequency: 2450 MHz; Duty Cycle: 1:1

Medium parameters used : $f = 2450$ MHz; $\sigma = 1.839$ S/m; $\epsilon_r = 40.341$; $\rho = 1000$ kg/m³

Phantom section: Flat Section

DASY5 Configuration:

- Probe: EX3DV4 - SN7839; ConvF(7.49, 6.81, 6.61) @ 2450 MHz; Calibrated: 2023/9/21
- Sensor-Surface: 1.4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn772; Calibrated: 2024/1/23
- Phantom: SAM (30deg probe tilt) with CRP v5.0_20150321; Type: QD000P40CD; Serial: TP:1874
- Measurement SW: DASY52, Version 52.10 (2); SEMCAD X Version 14.6.12 (7470)

Area Scan (6x9x1): Measurement grid: dx=12mm, dy=12mm

Maximum value of SAR (measured) = 5.21 W/kg

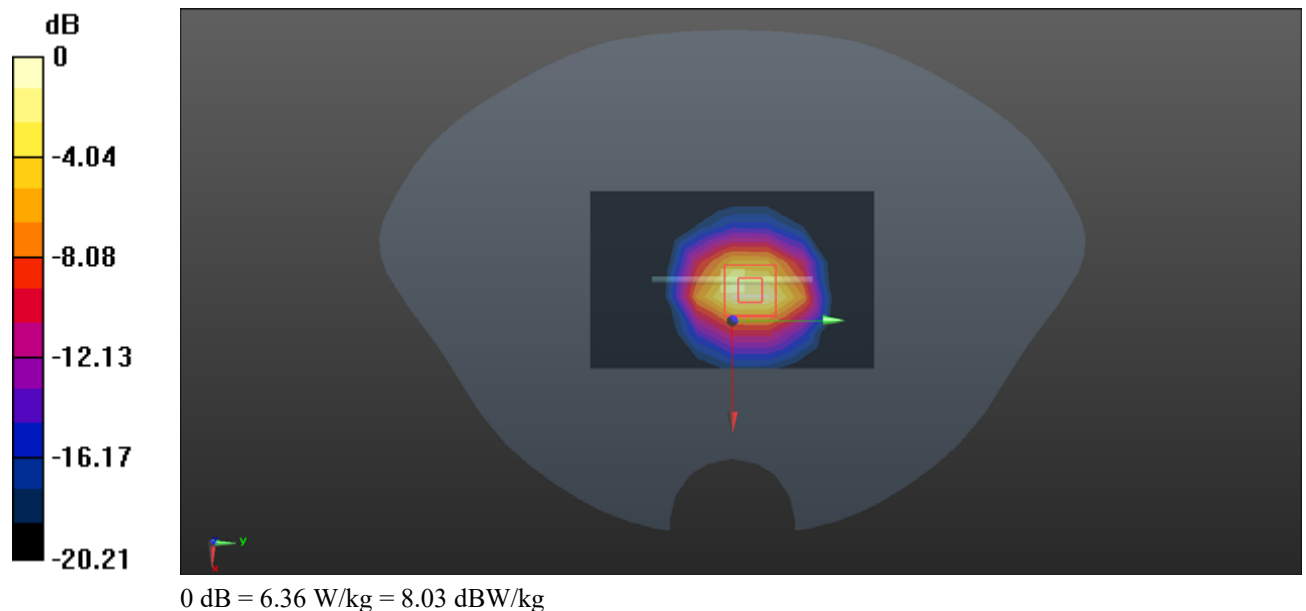
Zoom Scan (7x7x7)/Cube 0: Measurement grid: dx=5mm, dy=5mm, dz=5mm

Reference Value = 51.56 V/m; Power Drift = -0.12 dB

Peak SAR (extrapolated) = 9.83 W/kg

SAR(1 g) = 4.92 W/kg; SAR(10 g) = 2.28 W/kg

Maximum value of SAR (measured) = 6.36 W/kg



System Performance 5250 MHz Head**DUT: D5GHzV2; Type: 5250 MHz; Serial: 1246**

Communication System: CW; Frequency: 5250 MHz; Duty Cycle: 1:1

Medium parameters used: $f = 5250$ MHz; $\sigma = 4.719$ S/m; $\epsilon_r = 35.304$; $\rho = 1000$ kg/m³

Phantom section: Flat Section

DASY5 Configuration:

- Probe: EX3DV4 - SN7839; ConvF(5.62, 5.1, 4.97) @ 5250 MHz; Calibrated: 2023/9/21
- Sensor-Surface: 1.4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn772; Calibrated: 2024/1/23
- Phantom: SAM (30deg probe tilt) with CRP v5.0_20150321; Type: QD000P40CD; Serial: TP:1874
- Measurement SW: DASY52, Version 52.10 (2); SEMCAD X Version 14.6.12 (7470)

Area Scan (7x8x1): Measurement grid: dx=10mm, dy=10mm

Maximum value of SAR (measured) = 20.7 W/kg

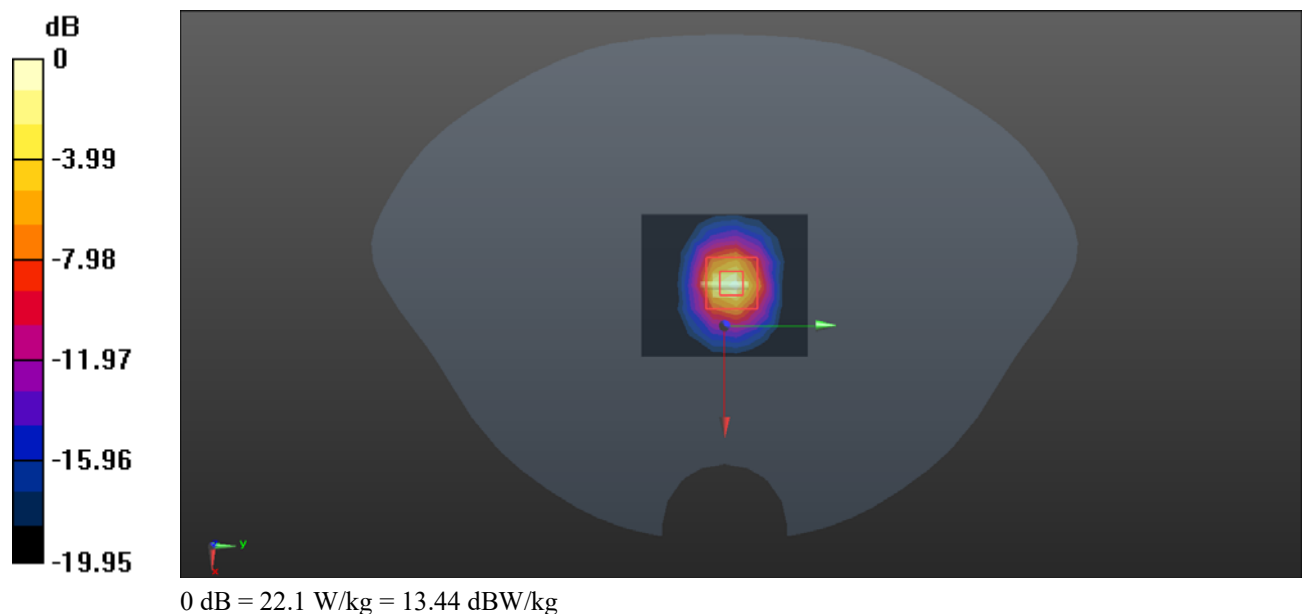
Zoom Scan (7x7x16)/Cube 0: Measurement grid: dx=4mm, dy=4mm, dz=2mm

Reference Value = 49.39 V/m; Power Drift = -0.17 dB

Peak SAR (extrapolated) = 32.5 W/kg

SAR(1 g) = 8.18 W/kg; SAR(10 g) = 2.3 W/kg

Maximum value of SAR (measured) = 22.1 W/kg



System Performance 5750 MHz Head**DUT: D5GHzV2; Type: 5750 MHz; Serial: 1246**

Communication System: CW; Frequency: 5750 MHz; Duty Cycle: 1:1

Medium parameters used: $f = 5750$ MHz; $\sigma = 5.356$ S/m; $\epsilon_r = 34.115$; $\rho = 1000$ kg/m³

Phantom section: Flat Section

DASY5 Configuration:

- Probe: EX3DV4 - SN7839; ConvF(5.04, 4.65, 4.62) @ 5750 MHz; Calibrated: 2023/9/21
- Sensor-Surface: 1.4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn772; Calibrated: 2024/1/23
- Phantom: SAM (30deg probe tilt) with CRP v5.0_20150321; Type: QD000P40CD; Serial: TP:1874
- Measurement SW: DASY52, Version 52.10 (2); SEMCAD X Version 14.6.12 (7470)

Area Scan (8x9x1): Measurement grid: dx=10mm, dy=10mm

Maximum value of SAR (measured) = 14.4 W/kg

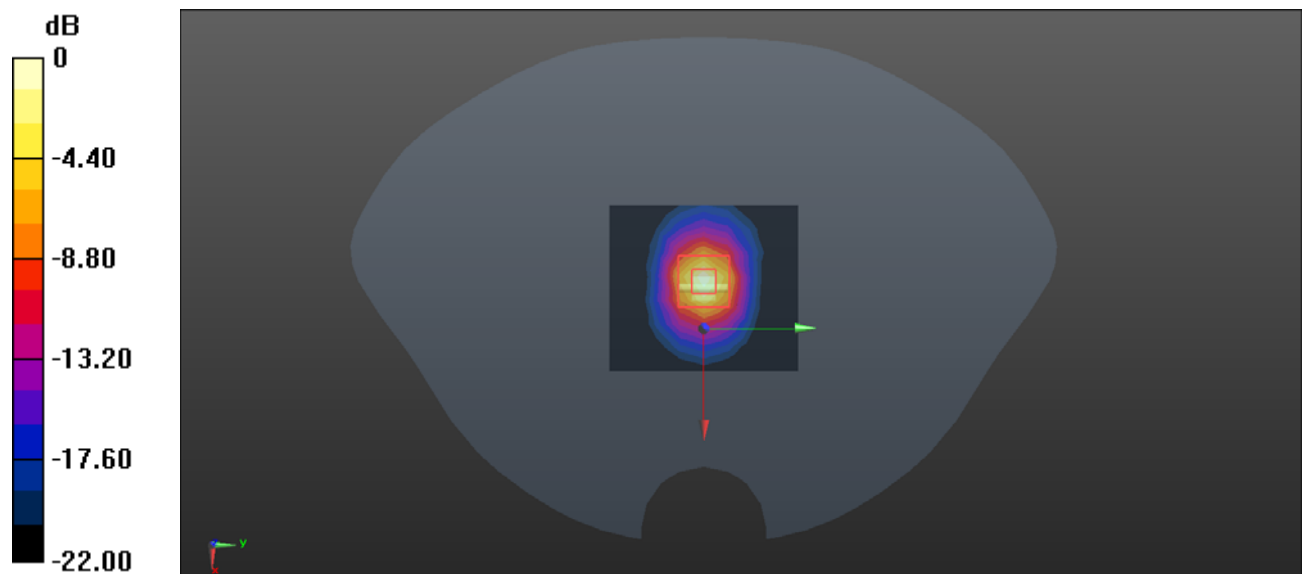
Zoom Scan (7x7x16)/Cube 0: Measurement grid: dx=4mm, dy=4mm, dz=2mm

Reference Value = 39.07 V/m; Power Drift = -0.16 dB

Peak SAR (extrapolated) = 24.3 W/kg

SAR(1 g) = 7.58 W/kg; SAR(10 g) = 2.31 W/kg

Maximum value of SAR (measured) = 16.9 W/kg

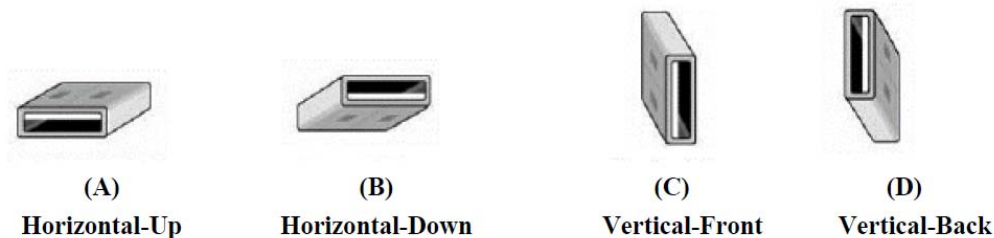


0 dB = 16.9 W/kg = 12.28 dBW/kg

6. EUT TEST STRATEGY AND METHODOLOGY

6.1 Test Positions for Dongle Device

Test all USB orientations [see figure below: (A) Horizontal-Up, (B) Horizontal-Down, (C) Vertical-Front, and (D) Vertical-Back] with a device-to-phantom separation distance of 5 mm or less, according to KDB Publication 447498 D01 requirements. These test orientations are intended for the exposure conditions found in typical laptop/notebook/netbook or tablet computers with either horizontal or vertical USB connector configurations at various locations in the keyboard section of the computer. Current generation portable host computers should be used to establish the required SAR measurement separation distance. The same test separation distance must be used to test all frequency bands and modes in each USB orientation. The typical Horizontal-Up USB connection (A), found in the majority of host computers, must be tested using an appropriate host computer. A host computer with either Vertical-Front (C) or Vertical-Back (D) USB connection should be used to test one of the vertical USB orientations. If a suitable host computer is not available for testing the Horizontal-Down (B) or the remaining Vertical USB orientation, a high quality USB cable, 12 inches or less, may be used for testing these other orientations. It must be documented that the USB cable does not influence the radiating characteristics and output power of the transmitter.



Note: These are USB connector orientations on laptop computers; USB dongles have the reverse configuration for plugging into the corresponding laptop computers.

Figure 1 – USB Connector Orientations Implemented on Laptop Computers

6.2 Test Distance for SAR Evaluation

In this case the EUT(Equipment Under Test) is set 5mm away from the phantom, the test distance is 5mm.

6.3 SAR Evaluation Procedure

The evaluation was performed with the following procedure:

Step 1: Measurement of the SAR value at a fixed location above the ear point or central position was used as a reference value for assessing the power drop. The SAR at this point is measured at the start of the test and then again at the end of the testing.

Step 2: The SAR distribution at the exposed side of the head was measured at a distance of 4 mm from the inner surface of the shell. The area covered the entire dimension of the head or radiating structures of the EUT, the horizontal grid spacing was 15 mm x 15 mm, and the SAR distribution was determined by integrated grid of 1.5mm x 1.5mm. Based on these data, the area of the maximum absorption was determined by spline interpolation. The first Area Scan covers the entire dimension of the EUT to ensure that the hotspot was correctly identified.

Step 3: Around this point, a volume of 30 mm x 30 mm x 30 mm was assessed by measuring 7x 7 x 7 points. On the basis of this data set, the spatial peak SAR value was evaluated under the following procedure:

- 1) The data at the surface were extrapolated, since the center of the dipoles is 1.2 mm away from the tip of the probe and the distance between the surface and the lowest measuring point is 1.3 mm. The extrapolation was based on a least square algorithm. A polynomial of the fourth order was calculated through the points in z-axes. This polynomial was then used to evaluate the points between the surface and the probe tip.

- 2) The maximum interpolated value was searched with a straightforward algorithm. Around this maximum the SAR values averaged over the spatial volumes (1 g or 10 g) were computed by the 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 integrated with the trapezoidal-algorithm. One thousand points (10 x 10 x 10) were interpolated to calculate the averages.

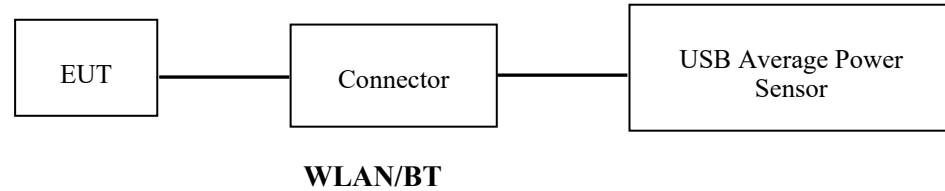
All neighboring volumes were evaluated until no neighboring volume with a higher average value was found.

Step 4: Re-measurement of the SAR value at the same location as in Step 1. If the value changed by more than 5%, the evaluation was repeated.

7. CONDUCTED OUTPUT POWER MEASUREMENT

7.1 Test Procedure

The RF output of the transmitter was connected to the input port of the USB Average Power Sensor through Connector.



7.2 Maximum Target Output Power

Max Target Power(dBm)			
Mode/Band	Channel		
	Low	Middle	High
WLAN 2.4G(802.11b)	17.5	17.5	17
WLAN 2.4G(802.11g)	15	15	15
WLAN 2.4G(802.11n ht20)	14	14	14
WLAN 2.4G(802.11n ht40)	15	15	15
WLAN 2.4G(802.11ax20)	16	16	16
WLAN 2.4G(802.11ax40)	16	16	16
WLAN 5.2G(802.11a)	15	17	17
WLAN 5.2G(802.11n20)	16.9	16.9	16.9
WLAN 5.2G(802.11n40)	16.9	/	16.9
WLAN 5.2G(802.11ac20)	16.9	16.9	16.9
WLAN 5.2G(802.11ac40)	16.5	/	16.5
WLAN 5.2G(802.11ac80)	/	14	/
WLAN 5.2G(802.11ax20)	15.5	16.5	16.9
WLAN 5.2G(802.11ax40)	16	/	16.9
WLAN 5.2G(802.11ax80)	/	14	/
WLAN 5.8G(802.11a)	17.5	17	17.5
WLAN 5.8G(802.11n20)	17	17	17
WLAN 5.8G(802.11n40)	17	/	17.4
WLAN 5.8G(802.11ac20)	17.4	17.4	17
WLAN 5.8G(802.11ac40)	17.4	/	17
WLAN 5.8G(802.11ac80)	/	17	/
WLAN 5.8G(802.11ax20)	17.4	17.4	17.4
WLAN 5.8G(802.11ax40)	17	/	17
WLAN 5.8G(802.11ax80)	/	17	/

7.3 Test Results:**WLAN 2.4G:**

Mode	Channel frequency (MHz)	Data Rate	Duty Cycle (%)	Conducted Average Output Power(dBm)
802.11b	2412	1Mbps	98.67	17.29
	2437			17.23
	2462			16.85
802.11g	2412	6Mbps	Not constant	14.39
	2437			14.32
	2462			14.41
802.11n ht20	2412	MCS0	Not constant	13.42
	2437			13.27
	2462			13.42
802.11n ht40	2422	MCS0	Not constant	14.21
	2437			14.65
	2452			14.4
802.11ax20	2412	MCS0	Not constant	15.57
	2437			15.36
	2462			15.41
802.11ax40	2422	MCS0	Not constant	15.28
	2437			15.26
	2452			15.49

WLAN 5.2G:

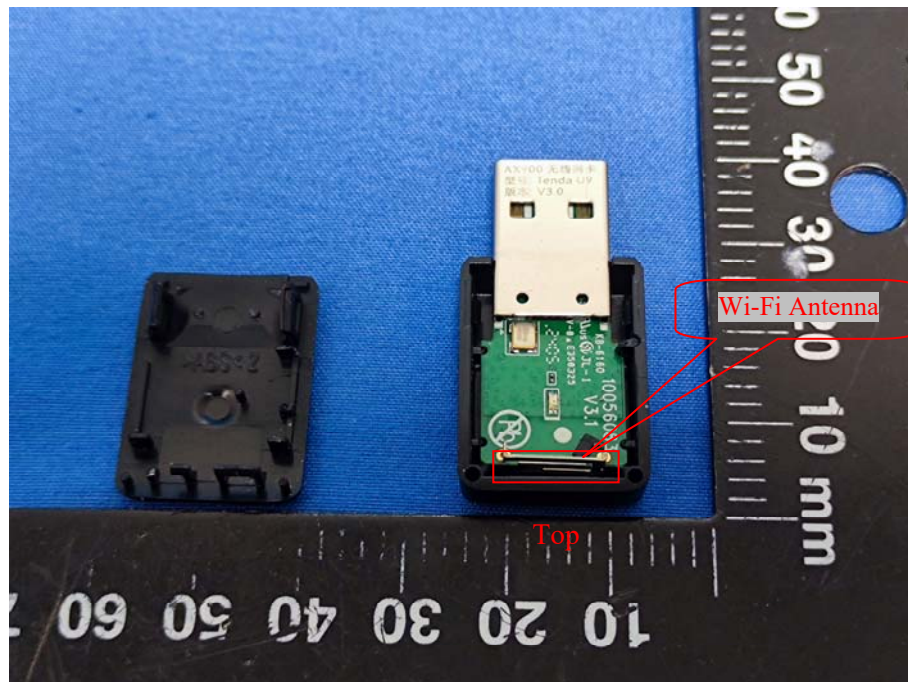
Mode	Channel frequency (MHz)	Data Rate	Duty Cycle (%)	Conducted Average Output Power(dBm)
802.11a	5180	6Mbps	96.15	14.85
	5200			16.63
	5240			16.97
802.11n20	5180	MCS0	Not constant	16.87
	5200			16.43
	5240			16.83
802.11n40	5190	MCS0	Not constant	16.23
	5230			16.85
802.11ac20	5180	MCS0	Not constant	16.21
	5200			16.82
	5240			16.74
802.11ac40	5190	MCS0	Not constant	15.19
	5230			16.43
802.11ac80	5210	MCS0	Not constant	13.44
802.11ax20	5180	MCS0	Not constant	15.29
	5200			16.42
	5240			16.84
802.11ax40	5190	MCS0	Not constant	15.91
	5230			16.51
802.11ax80	5210	MCS0	Not constant	13.86

WLAN 5.8G:

Mode	Channel frequency (MHz)	Data Rate	Duty Cycle (%)	Conducted Average Output Power(dBm)
802.11a	5745	6Mbps	85.22	17.01
	5785			16.91
	5825			17.11
802.11n20	5745	MCS0	Not constant	16.6
	5785			16.93
	5825			16.89
802.11n40	5755	MCS0	Not constant	16.98
	5795			17.02
802.11ac20	5745	MCS0	Not constant	17.05
	5785			17.10
	5825			16.88
802.11ac40	5755	MCS0	Not constant	17.08
	5795			16.93
802.11ac80	5775	MCS0	Not constant	16.49
802.11ax20	5745	MCS0	Not constant	17.00
	5785			17.02
	5825			17.04
802.11ax40	5755	MCS0	Not constant	16.88
	5795			16.93
802.11ax80	5775	MCS0	Not constant	16.91

8. STANDALONE SAR TEST EXCLUSION CONSIDERATIONS

8.1 Antennas Location:



8.2 Standalone SAR test exclusion considerations

Mode	Frequency (MHz)	Output Power (dBm)	Output Power (mW)	Distance (mm)	Calculated value	Threshold (1-g)	SAR Test Exclusion
WLAN 2.4G	2462	17.5	56.2	0	17.6	3	NO
WLAN 5.2G	5240	17	50.1	0	22.9	3	NO
WLAN 5.8G	5825	17.5	56.2	0	27.1	3	NO

NOTE:

The 1-g and 10-g SAR test exclusion thresholds for 100 MHz to 6 GHz at test separation distances ≤ 50 mm are determined by:

$$[(\text{max. power of channel, including tune-up tolerance, mW}) / (\text{min. test separation distance, mm})] \cdot$$

$$[\sqrt{f(\text{GHz})}] \leq 3.0 \text{ for 1-g SAR and } \leq 7.5 \text{ for 10-g extremity SAR, where}$$

1. $f(\text{GHz})$ is the RF channel transmit frequency in GHz.

2. Power and distance are rounded to the nearest mW and mm before calculation.

3. The result is rounded to one decimal place for comparison.

4. When the minimum test separation distance is < 5 mm, a distance of 5 mm is applied to determine SAR test Exclusion.

9. SAR MEASUREMENT RESULTS

This page summarizes the results of the performed dosimetric evaluation.

9.1 SAR Test Data

Environmental Conditions

Temperature:	21.4-22.5 °C	22.7-23.9 °C
Relative Humidity:	53 %	56%
ATM Pressure:	99.7 kPa	99.9 kPa
Test Date:	2024/04/19	2024/04/20

Testing was performed by Rain Yu, Wen Wang, Mark Dong.

WLAN 2.4G:

EUT Position	Frequency (MHz)	Test Mode	Max. Meas. Power (dBm)	Max. Rated Power (dBm)	1g SAR (W/kg)				
					Scaled Factor	Duty cycle Factor	Meas. SAR	Scaled SAR	Plot
Horizontal-Up	2412	802.11b	17.29	17.5	1.05	1.01	0.478	0.51	1#
	2437	802.11b	17.23	17.5	1.064	1.01	0.810	0.87	2#
	2462	802.11b	16.85	17	1.035	1.01	0.540	0.56	3#
Horizontal-Down	2412	802.11b	/	/	/	/	/	/	/
	2437	802.11b	17.23	17.5	1.064	1.01	0.699	0.75	4#
	2462	802.11b	/	/	/	/	/	/	/
Vertical-Front	2412	802.11b	/	/	/	/	/	/	/
	2437	802.11b	17.23	17.5	1.064	1.01	0.400	0.43	5#
	2462	802.11b	/	/	/	/	/	/	/
Vertical-Back With Extension Cable	2412	802.11b	/	/	/	/	/	/	/
	2437	802.11b	17.23	17.5	1.064	1.01	0.209	0.22	6#
	2462	802.11b	/	/	/	/	/	/	/
Body Top	2412	802.11b	/	/	/	/	/	/	/
	2437	802.11b	17.23	17.5	1.064	1.01	0.105	0.11	7#
	2462	802.11b	/	/	/	/	/	/	/

Note:

1. When the 1-g SAR is $\leq 0.8\text{W/kg}$, testing for other channels are optional.
2. When SAR or MPE 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.
3. According 2016 Oct. TCB, for SAR testing of BT and Wi-Fi signal with non-100% duty cycle, the measured SAR is scaled-up by the duty cycle scaling factor which is equal to "1/(duty cycle)".
4. A high quality USB cable, less than 12 inches, was used for testing Vertical-Back orientation, the USB cable does not influence the radiating characteristics and output power of the transmitter.

WLAN 5.2G:

EUT Position	Frequency (MHz)	Test Mode	Max. Meas. Power (dBm)	Max. Rated Power (dBm)	1g SAR (W/kg)				
					Scaled Factor	Duty cycle Factor	Meas. SAR	Scaled SAR	Plot
Horizontal-Up	5180	802.11a	/	/	/	/	/	/	/
	5200	802.11a	16.63	17	1.089	1.04	0.292	0.33	8#
	5240	802.11a	/	/	/	/	/	/	/
Horizontal-Down	5180	802.11a	/	/	/	/	/	/	/
	5200	802.11a	16.63	17	1.089	1.04	0.277	0.31	9#
	5240	802.11a	/	/	/	/	/	/	/
Vertical-Front	5180	802.11a	/	/	/	/	/	/	/
	5200	802.11a	16.63	17	1.089	1.04	0.196	0.22	10#
	5240	802.11a	/	/	/	/	/	/	/
Vertical-Back With Extension Cable	5180	802.11a	/	/	/	/	/	/	/
	5200	802.11a	16.63	17	1.089	1.04	0.070	0.08	11#
	5240	802.11a	/	/	/	/	/	/	/
Body Top	5180	802.11a	/	/	/	/	/	/	/
	5200	802.11a	16.63	17	1.089	1.04	0.073	0.08	12#
	5240	802.11a	/	/	/	/	/	/	/

WLAN 5.8G:

EUT Position	Frequency (MHz)	Test Mode	Max. Meas. Power (dBm)	Max. Rated Power (dBm)	1g SAR (W/kg)				
					Scaled Factor	Duty cycle Factor	Meas. SAR	Scaled SAR	Plot
Horizontal-Up	5745	802.11a	17.01	17.5	1.119	1.17	0.776	1.02	13#
	5785	802.11a	16.91	17	1.021	1.17	0.766	0.92	14#
	5825	802.11a	17.11	17.5	1.094	1.17	0.644	0.82	15#
Horizontal-Down	5745	802.11a	/	/	/	/	/	/	/
	5785	802.11a	16.91	17	1.021	1.17	0.299	0.36	16#
	5825	802.11a	/	/	/	/	/	/	/
Vertical-Front	5745	802.11a	/	/	/	/	/	/	/
	5785	802.11a	16.91	17	1.021	1.17	0.412	0.49	17#
	5825	802.11a	/	/	/	/	/	/	/
Vertical-Back With Extension Cable	5745	802.11a	/	/	/	/	/	/	/
	5785	802.11a	16.91	17	1.021	1.17	0.132	0.16	18#
	5825	802.11a	/	/	/	/	/	/	/
Body Top	5745	802.11a	17.01	17.5	1.119	1.17	0.747	0.98	19#
	5785	802.11a	16.91	17	1.021	1.17	0.871	1.04	20#
	5825	802.11a	17.11	17.5	1.094	1.17	0.753	0.96	21#

Note:

1. When the 1-g SAR is $\leq 0.8\text{W/kg}$, testing for other channels are optional.
2. When SAR or MPE 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.
3. For 802.11a mode power is the largest among 802.11a/n/ac/ax, 802.11 a mode as initial test configuration is selected to test.
4. According 2016 Oct. TCB, for SAR testing of BT and Wi-Fi signal with non-100% duty cycle, the measured SAR is scaled-up by the duty cycle scaling factor which is equal to "1/(duty cycle)".
5. A high quality USB cable, less than 12 inches, was used for testing Vertical-Back orientation, the USB cable does not influence the radiating characteristics and output power of the transmitter.

10. MEASUREMENT VARIABILITY

In accordance with published RF Exposure KDB procedure 865664 D01 SAR measurement 100 MHz to 6 GHz v01. 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 < 0.80 W/kg; steps 2) through 4) do not apply.
- 2) When the original highest measured SAR is ≥ 0.80 W/kg, 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 W/kg ($\sim 10\%$ from the 1-g SAR limit).
- 4) Perform a third repeated measurement only if the original, first or second repeated measurement is ≥ 1.5 W/kg and the ratio of largest to smallest SAR for the original, first and second repeated measurements is > 1.20 .

Note: The same procedures should be adapted for measurements according to extremity and occupational exposure limits by applying a factor of 2.5 for extremity exposure and a factor of 5 for occupational exposure to the corresponding SAR thresholds.

The Highest Measured SAR Configuration in Each Frequency Band

Body

SAR probe calibration point	Frequency Band	Freq.(MHz)	EUT Position	Meas. SAR (W/kg)		Largest to Smallest SAR Ratio
				Original	Repeated	
2450MHz	WLAN 2.4G	2437	Horizontal-Up	0.810	0.768	1.05
5750MHz	WLAN 5.8G	5785	Body Top	0.871	0.853	1.02

Note:

1. Second Repeated Measurement is not required since the ratio of the largest to smallest SAR for the original and first repeated measurement is not > 1.20 .
2. The measured SAR results **do not** have to be scaled to the maximum tune-up tolerance to determine if repeated measurements are required.
3. SAR measurement variability must be assessed for each frequency band, which is determined by the **SAR probe calibration point and tissue-equivalent medium** used for the device measurements.

11. SAR SIMULTANEOUS TRANSMISSION DESCRIPTION

11.1 Simultaneous Transmission:

Description of Simultaneous Transmit Capabilities		
Transmitter Combination	Simultaneous?	Hotspot?
2.4G WLAN + 5G WLAN	×	×

APPENDIX A - MEASUREMENT UNCERTAINTY

The uncertainty budget has been determined for the measurement system and is given in the following Table.

Measurement uncertainty evaluation for IEEE1528-2013 SAR test

Uncertainty component	Tolerance/ uncertainty ± %	Probability distribution	Divisor	ci (1 g)	ci (10 g)	Standard uncertainty ± %, (1 g)	Standard uncertainty ± %, (10 g)
Measurement system							
Probe calibration(k=1)	6.55	N	1	1	1	6.6	6.6
Axial isotropy	4.7	R	$\sqrt{3}$	$\sqrt{0.5}$	$\sqrt{0.5}$	1.9	1.9
Hemispherical isotropy	9.6	R	$\sqrt{3}$	$\sqrt{0.5}$	$\sqrt{0.5}$	3.9	3.9
Boundary effect	1.0	R	$\sqrt{3}$	1	1	0.6	0.6
Linearity	4.7	R	$\sqrt{3}$	1	1	2.7	2.7
System detection limits	1.0	R	$\sqrt{3}$	1	1	0.6	0.6
Modulation response	0.0	R	$\sqrt{3}$	1	1	0.0	0.0
Readout electronics	0.3	N	1	1	1	0.3	0.3
Response time	0.0	R	$\sqrt{3}$	1	1	0.0	0.0
Integration time	0.0	R	$\sqrt{3}$	1	1	0.0	0.0
RF ambient conditions-noise	1.0	R	$\sqrt{3}$	1	1	0.6	0.6
RF ambient conditions-reflections	1.0	R	$\sqrt{3}$	1	1	0.6	0.6
Probe positioner mech. tolerance	0.8	R	$\sqrt{3}$	1	1	0.5	0.5
Probe positioning with respect to phantom shell	6.7	R	$\sqrt{3}$	1	1	3.9	3.9
Extrapolation, interpolation, and integrations algorithms for max. SAR evaluation	2.0	R	$\sqrt{3}$	1	1	1.2	1.2
Test sample related							
Test sample positioning	3.3	N	1	1	1	3.3	3.3
Device holder uncertainty	4.7	N	1	1	1	4.7	4.7
Output power variation – SAR draft measurement	5.0	R	$\sqrt{3}$	1	1	2.9	2.9
SAR scaling	2.8	R	$\sqrt{3}$	1	1	1.6	1.6
Phantom and tissue parameters							
Phantom shell uncertainty – shape, thickness and permittivity	4.0	R	$\sqrt{3}$	1	1	2.3	2.3
Uncertainty in SAR correction for deviations in permittivity and conductivity	1.9	N	1	1	0.84	1.9	1.6
Liquid conductivity meas.	2.5	N	1	0.78	0.71	2.0	1.8
Liquid permittivity meas.	2.5	N	1	0.23	0.26	0.6	0.7
Liquid conductivity – temperature uncertainty	1.7	R	$\sqrt{3}$	0.78	0.71	0.8	0.7
Liquid permittivity – temperature uncertainty	0.3	R	$\sqrt{3}$	0.23	0.26	0.0	0.0
Combined standard uncertainty		RSS				12.1	12.0
Expanded uncertainty (95 % confidence interval)		k=2				24.2	24.0

Measurement uncertainty evaluation for IEC62209-2 SAR test

Source of uncertainty	Tolerance/ Uncertainty value $\pm$ %	Probability Distribution	Divisor	ci (1 g)	ci (10 g)	Standard uncertainty $\pm$ %, (1 g)	Standard uncertainty $\pm$ %, (10 g)
Measurement system							
Probe calibration	6.55	N	1	1	1	6.6	6.6
Isotropy	4.7	R	$\sqrt{3}$	1	1	2.7	2.7
Linearity	4.7	R	$\sqrt{3}$	1	1	2.7	2.7
Probe modulation response	0.0	R	$\sqrt{3}$	1	1	0.0	0.0
Detection limits	1.0	R	$\sqrt{3}$	1	1	0.6	0.6
Boundary effect	1.0	R	$\sqrt{3}$	1	1	0.6	0.6
Readout electronics	0.3	N	1	1	1	0.3	0.3
Response time	0.0	R	$\sqrt{3}$	1	1	0.0	0.0
Integration time	0.0	R	$\sqrt{3}$	1	1	0.0	0.0
RF ambient conditions – noise	1.0	R	$\sqrt{3}$	1	1	0.6	0.6
RF ambient conditions – reflections	1.0	R	$\sqrt{3}$	1	1	0.6	0.6
Probe positioner mech. restrictions	0.8	R	$\sqrt{3}$	1	1	0.5	0.5
Probe positioning with respect to phantom shell	6.7	R	$\sqrt{3}$	1	1	3.9	3.9
Post-processing	2.0	R	$\sqrt{3}$	1	1	1.2	1.2
Test sample related							
Device holder uncertainty	4.7	N	1	1	1	4.7	4.7
Test sample positioning	3.3	N	1	1	1	3.3	3.3
Power scaling	4.5	R	$\sqrt{3}$	1	1	2.6	2.6
Drift of output power (measured SAR drift)	5.0	R	$\sqrt{3}$	1	1	2.9	2.9
Phantom and set-up							
Phantom uncertainty (shape and thickness tolerances)	4.0	R	$\sqrt{3}$	1	1	2.3	2.3
Algorithm for correcting SAR for deviations in permittivity and conductivity	1.9	N	1	1	0.84	1.9	1.6
Liquid conductivity (meas.)	2.5	N	1	0.78	0.71	2.0	1.8
Liquid permittivity (meas.)	2.5	N	1	0.23	0.26	0.6	0.7
Liquid conductivity – temperature uncertainty	1.7	R	$\sqrt{3}$	0.78	0.71	0.8	0.7
Liquid permittivity – temperature uncertainty	0.3	R	$\sqrt{3}$	0.23	0.26	0.0	0.0
Combined standard uncertainty		RSS				11.8	11.7
Expanded uncertainty (95 % confidence interval)						23.6	23.4

APPENDIX B - SAR PLOTS

Please refer to the attachment.

APPENDIX C - EUT TEST POSITION PHOTOS

Please refer to the attachment.

APPENDIX D - PROBE CALIBRATION CERTIFICATES

Please refer to the attachment.

APPENDIX E - DIPOLE CALIBRATION CERTIFICATES

Please refer to the attachment.

===== END OF REPORT =====