

## **SAR TEST REPORT**

*For*

**WIRELESS CAMERA**

**Model No: 92616A**

**REPORT NO.: ES160928014E**

**ISSUE DATE: October 24, 2016**

*Prepared for*

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## 1 TEST RESULT CERTIFICATION

|                      |  |
|----------------------|--|
| Applicant:           | General Sensing Systems LLC<br>250 CLEARBROOK RD STE 260, ELMSFORD, New York, United States<br>10523 |
| Manufacturer:        | General Sensing Systems LLC<br>250 CLEARBROOK RD STE 260, ELMSFORD, New York, United States<br>10523 |
| Product Description: | WIRELESS CAMERA  |
| Model No.:           | 92616A   |
| File Number:         | ES160928014E   |
| Date of Test:        | October 18, 2016 to October 24, 2016   |


Measurement Procedure Used:

| APPLICABLE STANDARDS   |             |
|--|-------------|
| STANDARD   | TEST RESULT |
| FCC 47 CFR Part 2 (2.1093)<br>ANSI/IEEE C95.1-1992<br>IEEE 1528-2013 | PASS        |


The above equipment was tested by EMTEK (SHENZHEN) CO., LTD. The test data, data evaluation, test procedures, and equipment configurations shown in this report were made in accordance with the procedures given in IEEE 1528-2013. This device is in compliance with Specific Absorption Rate (SAR) for general population/uncontrolled exposure limits (1.6 W/kg) specified in FCC 47 CFR part 2 (2.1093) and ANSI/IEEE C95.1-1992.

The test results of this report relate only to the tested sample identified in this report.

Date of Test : October 18, 2016 to October 24, 2016

Prepared by :   
Hopping Chen/Editor

Reviewer :   
Yaping Shen/Supervisor

Approve & Authorized Signer :   
Lisa Wang/Manager

## 2 EUT TECHNICAL DESCRIPTION

| Characteristics            | Description  |
|----------------------------|--|
| Device Type:               | WIRELESS CAMERA  |
| Exposure Category:         | Uncontrolled Environment/General Population                    |
| Test Modulation:           | OFDM for 802.11g/n;<br>DSSS with DBPSK/DQPSK/CCK for 802.11b;  |
| Operating Frequency Range: | 2412-2462MHz for 802.11b/g;<br>2412-2462MHz for 802.11n(HT20); |
| Number of Channels:        | 11 channels for 802.11b/g/n(HT20);                             |
| Antenna Type:              | FPC Antenna  |
| Antenna Gain:              | N/A  |
| Power supply:              | <input checked="" type="checkbox"/> DC supply:<br>DC 5V        |
| Temperature Range:         | 0°C ~ +40°C  |
| Product Software Version:  | N/A  |
| Product Hardware Version:  | FD9988-MAIN-V2   |
| Radio Software Version:    | 802.11b/g/n  |
| Radio Hardware Version:    | N/A  |
| Test Channel:              | 802.11b  |

**Note:**

1. For more details, please refer to the User's manual of the EUT.
2. The sample under test was selected by the Client.

**Modified Information**

| Rev.    | Summary         | Date of Rev. | Report No.   |
|---------|-----------------|--------------|--------------|
| Ver.1.0 | Original Report | 2016-10-24   | ES160928014E |
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### 3 STATEMENT OF COMPLIANCE

| Equipment Class                         | Frequency Band | Operating Mode | Highest SAR Summary                |                                    |  |
|---|----------------|----------------|------------------------------------|------------------------------------|--|
|   |                |                | Head<br>1g SAR (W/kg)<br>(Gap 0cm) | Body<br>1g SAR (W/kg)<br>(Gap 0cm) | Simultaneous<br>Transmission<br>SAR (W/kg) |
| <input type="checkbox"/> DSS            | Bluetooth      | Data           | N/A                                | N/A                                | N/A  |
| <input checked="" type="checkbox"/> DTS | WLAN 2.4GHz    | Data           | 0.257                              | 0.245                              | N/A  |
| NOTE: N/A (Not Applicable)              |                |                |                                    |                                    |  |

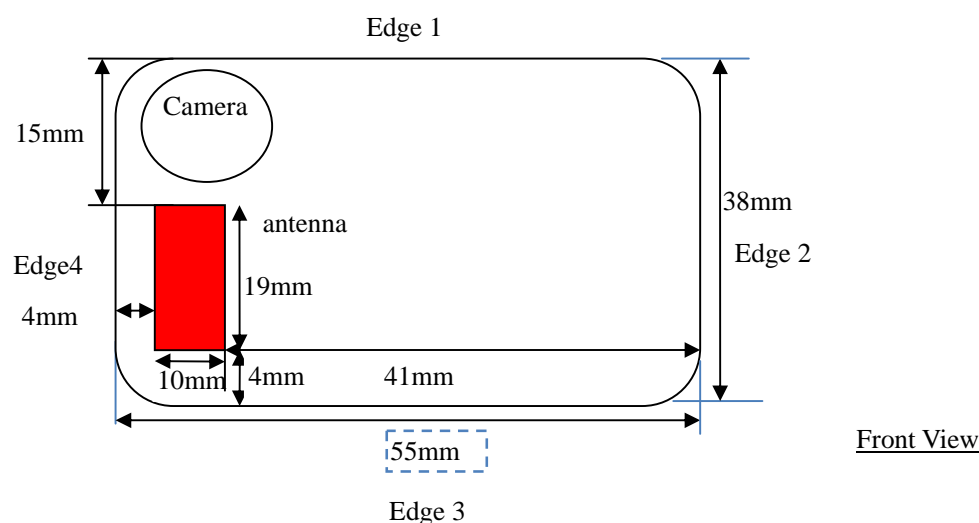
### 4 AUXILIARY EQUIPMENT DETAILS

| AE: Battery   | Description |
|---------------|-------------|
| Manufacturer: | /           |
| Model:        | GSP753332   |
| S/N:          | /           |
| capacity:     | 1020mh      |
| Voltage:      | 3.8V        |

### 5 TEST FACILITY

| Site Description |   |
|------------------|---|
| EMC Lab.         | : Accredited by CNAS, 2013.10.29<br>The certificate is valid until 2017.10.28<br>The Laboratory has been assessed and proved to be in compliance with<br>CNAS/CL01: 2006(identical to ISO/IEC17025: 2005)<br>The Certificate Registration Number is L2291<br>Accredited by TUV Rheinland Shenzhen 2010.5.25<br>The Laboratory has been assessed according to the requirements ISO/IEC 17025 |
|                  | : Accredited by FCC, April 17, 2014<br>The Certificate Registration Number is 406365.<br>Accredited by Industry Canada, March 05, 2010<br>The Certificate Registration Number is 4480A-2.   |
| Name of Firm     | : EMTEK (SHENZHEN) CO., LTD.  |
| Site Location    | : Bldg 69, Majialong Industry Zone, Nanshan District, Shenzhen, Guangdong, China  |

## 6 ANTENNA LOCATIONS



Sides for SAR Testing:

| Mode        | Front Face | Bottom Face | Edge1 | Edge2 | Edge3 | Edge4 |
|-------------|------------|-------------|-------|-------|-------|-------|
| WLAN 2.4GHz | YES        | YES         | YES   | YES   | YES   | YES   |

SAR test reduction and exclusion guidance:

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

$$\left[ \frac{\text{max. power of channel, including tune-up tolerance, mW}}{\text{min. test separation distance, mm}} \right] \cdot [\sqrt{f_{\text{GHz}}}] \leq 3.0$$
 for 1-g SAR and  $\leq 7.5$  for 10-g extremity SAR, where

- $f_{\text{GHz}}$  is the RF channel transmit frequency in GHz
- Power and distance are rounded to the nearest mW and mm before calculation
- The result is rounded to one decimal place for comparison
- 3.0 and 7.5 are referred to as the numeric thresholds in the step 2 below

The test exclusions are applicable only when the minimum test separation distance is  $\leq 50$  mm and for transmission frequencies between 100 MHz and 6 GHz. When the minimum test separation distance is  $< 5$  mm, a distance of 5 mm according to 5) in section 4.1 is applied to determine SAR test exclusion.

| Exposure Position | Wireless Interface      | 802.11b |
|-------------------|-------------------------|---------|
|                   | Calculated Frequency    | 2412MHz |
|                   | Maximum power (dBm)     | 16.46   |
|                   | Maximum rated power(mW) | 53.16   |
| Front Face        | Separation distance(mm) | 1       |
|                   | exclusion threshold     | 50      |
|                   | Testing required?       | Yes     |
| Bottom Face       | Separation distance(mm) | 17      |
|                   | exclusion threshold     | 50      |
|                   | Testing required?       | Yes     |
| Edge 1            | Separation distance(mm) | 15      |
|                   | exclusion threshold     | 50      |

|        |                         |     |
|--------|-------------------------|-----|
|        | Testing required?       | Yes |
| Edge 2 | Separation distance(mm) | 41  |
|        | exclusion threshold     | 50  |
|        | Testing required?       | Yes |
| Edge 3 | Separation distance(mm) | 4   |
|        | exclusion threshold     | 50  |
|        | Testing required?       | Yes |
| Edge 4 | Separation distance(mm) | 4   |
|        | exclusion threshold     | 50  |
|        | Testing required?       | Yes |

2) At 100 MHz to 6 GHz and for test separation distances > 50 mm, the SAR test exclusion threshold is determined according to the following, and as illustrated in Appendix B:

a)  $[\text{Power allowed at numeric threshold for 50 mm in step 1}) + (\text{test separation distance} - 50 \text{ mm}) \cdot (f_{\text{MHz}}/150)]$  mW, at 100 MHz to 1500 MHz

b)  $[\text{Power allowed at numeric threshold for 50 mm in step 1}) + (\text{test separation distance} - 50 \text{ mm}) \cdot 10]$  mW at > 1500 MHz and ≤ 6 GHz

|                   |                         |         |
|-------------------|-------------------------|---------|
| Exposure Position | Wireless Interface      | 802.11b |
|                   | Calculated Frequency    | 2412MHz |
|                   | Maximum power (dBm)     | 16.46   |
|                   | Maximum rated power(mW) | 53.16   |
| Front Face        | Separation distance(mm) | 1       |
|                   | exclusion threshold(mW) | 5.19    |
|                   | Testing required?       | Yes     |
| Bottom Face       | Separation distance(mm) | 17      |
|                   | exclusion threshold(mW) | 24.23   |
|                   | Testing required?       | Yes     |
| Edge 1            | Separation distance(mm) | 15      |
|                   | exclusion threshold(mW) | 21.58   |
|                   | Testing required?       | Yes     |
| Edge 2            | Separation distance(mm) | 41      |
|                   | exclusion threshold(mW) | 46.72   |
|                   | Testing required?       | Yes     |
| Edge 3            | Separation distance(mm) | 4       |
|                   | exclusion threshold(mW) | 10.61   |
|                   | Testing required?       | Yes     |
| Edge 4            | Separation distance(mm) | 4       |
|                   | exclusion threshold(mW) | 10.61   |
|                   | Testing required?       | Yes     |



## 7 GUIDANCE STANDARD

The Specific Absorption Rate (SAR) testing specification, method, and procedure for this device is in accordance with the following standards:

**FCC 47CFR §2.1093** Radiofrequency Radiation Exposure Evaluation: Portable Devices

**ANSI C95.1, 1992:** Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 kHz to 300 GHz.(IEEE Std C95.1-1991)

**IEEE Std 1528™-2013:** IEEE Recommended Practice for Determining the Peak Spatial-Average Specific Absorption Rate (SAR) in the Human Head from Wireless Communications Devices: Measurement Techniques.

**KDB 865664 D01** SAR measurement 100 MHz to 6 GHz v01r04: SAR Measurement Requirements for 100 MHz to 6 GHz

☒ **KDB 447498 D01** Mobile Portable RF Exposure v06: Mobile and Portable Device RF Exposure Procedures and Equipment Authorization Policies

☒ **KDB 248227 D01** 802.11 Wi-Fi SAR v02r02: SAR GUIDANCE FOR IEEE 802.11 (Wi-Fi) TRANSMITTERS.

☒ **KDB 616217 D04** SAR for laptop and tablets v01r02: SAR Evaluation Considerations for Laptop, Notebook, Netbook and Tablet Computers

**Remark:**

This portable wireless equipment has been measured in all cases requested by the relevant standards. Test results in Chapter 11 of this test report are below limits specified in the relevant standards for the tested bands only.

## 8 RF EXPOSURE

### 8.1 LIMITS

#### Uncontrolled Environment

Uncontrolled Environments are defined as locations where there is the exposure of individuals who have no knowledge or control of their exposure. The general population/uncontrolled exposure limits are applicable to situations in which the general public may be exposed or in which persons who are exposed as a consequence of their employment may not be made fully aware of the potential for exposure or cannot exercise control over their exposure. Members of the general public would come under this category when exposure is not employment-related; for example, in the case of a wireless transmitter that exposes persons in its vicinity.

#### Controlled Environment

Controlled Environments are defined as locations where there is exposure that may be incurred by persons who are aware of the potential for exposure, (i.e. as a result of employment or occupation). In general, occupational/controlled exposure limits are applicable to situations in which persons are exposed as a consequence of their employment, who have been made fully aware of the potential for exposure and can exercise control over their exposure. The 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.

Limits for Occupational/Controlled Exposure (W/kg)

| Whole-Body | Partial-Body | Hands, Wrists, Feet and ankles |
|------------|--------------|--------------------------------|
| 0.4        | 8.0          | 20.0                           |

Limits for General Population/Uncontrolled Exposure (W/kg)

| Whole-Body | Partial-Body | Hands, Wrists, Feet and ankles |
|------------|--------------|--------------------------------|
| 0.08       | 1.6          | 4.0                            |

Whole-Body SAR is averaged over the entire body, partial-body SAR is averaged over any 1gram of tissue defined as a tissue volume in the shape of a cube. SAR for hands, wrists, feet and ankles is averaged over any 10 grams of tissue defined as a tissue volume in the shape of a cube.

### 8.2 EVALUATION

☒ According to §15.247 (i) and §1.1307(b)(1), systems operating under the provisions of this section shall be operated in a manner that ensures that the public is not exposed to radio frequency energy level in excess of the Commission's guidelines.

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

$$\left[ \frac{(\text{max. power of channel, including tune-up tolerance, mW})}{(\text{min. test separation distance, mm})} \right] \cdot [\sqrt{f_{\text{(GHz)}}}] \leq 3.0 \text{ for 1-g SAR and } \leq 7.5 \text{ for 10-g extremity SAR,}^{25} \text{ where}$$

- $f_{\text{(GHz)}}$  is the RF channel transmit frequency in GHz
- Power and distance are rounded to the nearest mW and mm before calculation<sup>26</sup>
- The result is rounded to one decimal place for comparison
- 3.0 and 7.5 are referred to as the numeric thresholds in the step 2 below

The test exclusions are applicable only when the minimum *test separation distance* is  $\leq 50$  mm and for transmission frequencies between 100 MHz and 6 GHz. When the minimum *test separation distance* is  $< 5$  mm, a distance of 5 mm according to 5) in section 4.1 is applied to determine SAR test exclusion.

Routine SAR evaluation refers to that specifically required by § 2.1093, using measurements or computer simulation. When routine SAR evaluation is not required, portable transmitters with output power greater

than the applicable low threshold require SAR evaluation to qualify for TCB approval.

### 8.3 SAR TESTING FOR TABLET

This device can be used also in full sized tablet exposure conditions, due to its size >20cm. Per FCC KDB 616217, the back surface and edges of the tablet should be tested for SAR compliance with the tablet touching the phantom. The SAR exclusion threshold in KDB 447498 D01v06 can be applied to determine SAR test exclusion for adjacent edge configurations. The closest distance from the antenna to an adjacent tablet edge is used to determine if SAR testing is required for the adjacent edges, with the adjacent edge positioned against the phantom and the edge containing the antenna positioned perpendicular to the phantom.

### 8.4 MAXIMUM TUNE-UP LIMIT

For Wifi:

| Mode       | Frequency (GHz) | Channel | Target power (dBm) | Tolerance (dBm) |
|------------|-----------------|---------|--------------------|-----------------|
| 11b        | 2.412           | Low     | 16.5               | ±1              |
|            | 2.437           | Mid     | 16.5               | ±1              |
|            | 2.462           | High    | 16.5               | ±1              |
| 11g        | 2.412           | Low     | 15                 | ±1              |
|            | 2.437           | Mid     | 15                 | ±1              |
|            | 2.462           | High    | 14                 | ±1              |
| 11n (HT20) | 2.412           | Low     | 14                 | ±1              |
|            | 2.437           | Mid     | 14                 | ±1              |
|            | 2.462           | High    | 14                 | ±1              |

## 9 SPECIFIC ABSORPTION RATE (SAR)

### 9.1 INTRODUCTION

SAR is related to the rate at which energy is absorbed per unit mass in an object exposed to a radio field. The SAR distribution in a biological body is complicated and is usually carried out by experimental techniques or numerical modeling. The standard recommends limits for two tiers of groups, occupational/controlled and general population/uncontrolled, based on a person's awareness and ability to exercise control over his or her exposure. In general, occupational/controlled exposure limits are higher than the limits for general population/uncontrolled.

### 9.2 SAR DEFINITION

The SAR definition is the time derivative (rate) of the incremental energy ( $dW$ ) absorbed by (dissipated in) an incremental mass ( $dm$ ) contained in a volume element ( $dv$ ) of a given density ( $\rho$ ). The equation description is as below:

$$SAR = \frac{d}{dt} \left( \frac{dW}{dm} \right) = \frac{d}{dt} \left( \frac{dW}{\rho dv} \right)$$

SAR is expressed in units of Watts per kilogram (W/kg)

SAR measurement can be either related to the temperature elevation in tissue by

$$SAR = c \left( \frac{\delta T}{\delta t} \right)$$

Where: C is the specific heat capacity,  $\delta T$  is the temperature rise and  $\delta t$  is the exposure duration, or related to the electrical field in the tissue by

$$SAR = \frac{\sigma |E|^2}{\rho}$$

Where:  $\sigma$  is the conductivity of the tissue  $\rho$  is the mass density of tissue and  $E$  is the RMS electrical field strength.

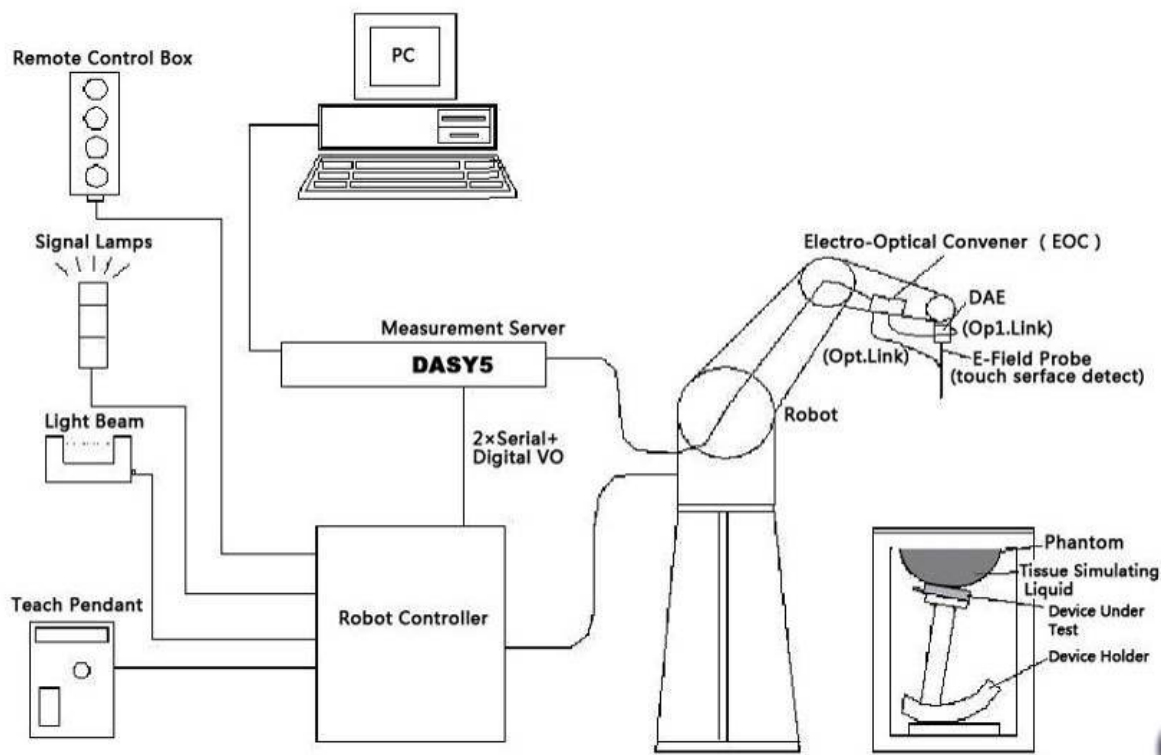
However for evaluating SAR of low power transmitter, electrical field measurement is typically applied.

## 10 SAR MEASUREMENTS SYSTEM CONFIGURATION

### 10.1 SAR MEASUREMENT SET-UP

The DASY5 system for performing compliance tests consists of the following items:

- A standard high precision 6-axis robot (Stäubli TX=RX family) 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 WinXP and the DASY5 software.
- Remote control and teach pendant as well as additional circuitry for robot safety such as warning lamps, etc.
- The generic twin phantom enabling the testing of left-hand and right-hand usage.
- The device holder for handheld mobile phones.
- Tissue simulating liquid mixed according to the given recipes.
- System validation dipoles allowing to validate the proper functioning of the system.



Picture 1. SAR Lab Test Measurement Set-up

## 10.2 DASY5 E-FIELD PROBE SYSTEM

The SAR measurements were conducted with the dosimetric probe designed in the classical triangular configuration and optimized for dosimetric evaluation. The probe is constructed using the thick film technique; with printed resistive lines on ceramic substrates. The probe is equipped with an optical multifiber line ending at the front of the probe tip. It is connected to the EOC box on the robot arm and provides an automatic detection of the phantom surface. Half of the fibers are connected to a pulsed infrared transmitter, the other half to a synchronized receiver. As the probe approaches the surface, the reflection from the surface produces a coupling from the transmitting to the receiving fibers. This reflection increases first during the approach, reaches maximum and then decreases. If the probe is flatly touching the surface, the coupling is zero. The distance of the coupling maximum to the surface is independent of the surface reflectivity and largely independent of the surface to probe angle. The DASY5 software reads the reflection turning a software approach and looks for the maximum using 2<sup>nd</sup> ord curve fitting. The approach is stopped at reaching the maximum.

### Probe Specifications:

|                   |   |
|-------------------|---|
| Model:            | EX3DV4  |
| Frequency Range:  | 10MHz — 6.0GHz (EX3DV4)   |
| Calibration:      | In head and body simulating tissue at<br>Frequencies from 835 up to 5800MHz                       |
| Linearity:        | ± 0.2 dB (30 MHz to 6 GHz) for EX3DV4   |
| Dynamic Range:    | 10 mW/kg — 100W/kg  |
| Probe Length:     | 330 mm  |
| Probe Tip Length: | 20 mm   |
| Body Diameter:    | 12 mm   |
| Tip Diameter:     | 2.5 mm  |
| Tip-Center:       | 1 mm  |
| Application:      | SAR Dosimetry Testing<br>Compliance tests of mobile phones<br>Dosimetry in strong gradient fields |



Picture 2 E-field Probe

### 10.3 E-FIELD PROBE CALIBRATION

Each E-Probe/Probe Amplifier combination has unique calibration parameters. A TEM cell calibration procedure is conducted to determine the proper amplifier settings to enter in the probe parameters. The amplifier settings are determined for a given frequency by subjecting the probe to a known E-field density (1 mW/cm<sup>2</sup>) using an RF Signal generator, TEM cell, and RF Power Meter.

The free space E-field from amplified probe outputs is determined in a test chamber. This calibration can be performed in a TEM cell if the frequency is below 1 GHz and in a waveguide or other methodologies above 1 GHz for free space. For the free space calibration, the probe is placed in the volumetric center of the cavity and at the proper orientation with the field. The probe is then rotated 360 degrees until the three channels show the maximum reading. The power density readings equate to 1 mW/cm<sup>2</sup>.

E-field temperature correlation calibration is performed in a flat phantom filled with the appropriate simulated brain tissue. The E-field in the medium correlates with the temperature rise in the dielectric medium. For temperature correlation calibration a RF transparent thermistor-based temperature probe is used in conjunction with the E-field probe.

$$SAR = C \frac{\Delta T}{\Delta t}$$

Where:

$\Delta t$  = Exposure time (30 seconds),

C = Heat capacity of tissue (brain or muscle),

$\Delta T$  = Temperature increase due to RF exposure.

$$SAR = \frac{|E|^2 \cdot \sigma}{\rho}$$

Where:

$\sigma$  = Simulated tissue conductivity,

$\rho$  = Tissue density (kg/m<sup>3</sup>).

### 10.4 OTHER TEST EQUIPMENT

#### 10.4.1 Data Acquisition Electronics (DAE)

The data acquisition electronics 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 the DAE is 200 MOhm; the inputs are symmetrical and floating. Common mode rejection is above 80 dB.

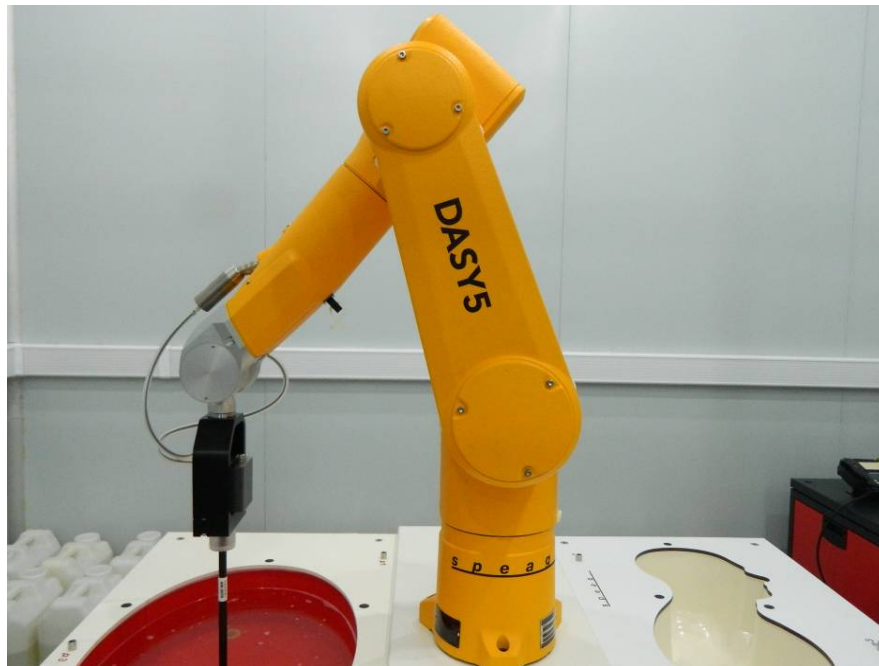


Picture 3: DAE

#### 10.4.2 Robot

The SPEAG DASY system uses the high precision robots (DASY5: TX60XL) type from Stäubli SA (France). For the 6-axis controller system, the robot controller version from Stäubli is used. The Stäubli robot series have many features that are 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 synchron motors; no stepper motors)
- Low ELF interference (motor control fields shielded via the closed metallic construction shields)



**Picture 4 DASY 5**

#### 10.4.3 Measurement Server

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



**Picture 5 Server for DASY 5**

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 pinout, and therefore only devices provided by SPEAG can be connected. Devices from any other supplier could seriously damage the measurement server.

#### 10.4.4 Device Holder for Phantom

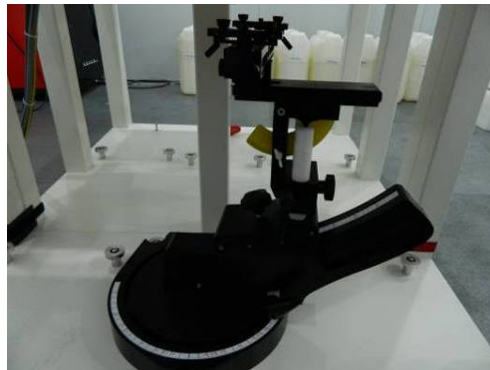
The SAR in the phantom is approximately inversely proportional to the square of the distance between the source and the liquid surface. For a source at 5mm distance, a positioning uncertainty of  $\pm 0.5\text{mm}$  would produce a SAR uncertainty of  $\pm 20\%$ . Accurate device positioning is therefore crucial for accurate and repeatable measurements. The positions in which the devices must be measured are defined by the standards.

The DASY device holder is designed to cope with the different positions given in the standard. It has two scales for device rotation (with respect to the body axis) and device inclination (with respect to the line between the ear reference points). The rotation centers for both scales are the ear reference point (ERP). Thus the device needs no repositioning when changing the angles.

The DASY device holder is constructed of low-loss POM material having the following dielectric parameters: relative permittivity  $\epsilon = 3$  and loss tangent  $\delta = 0.02$ . The amount of dielectric material has been reduced in the closest vicinity of the device, since measurements have suggested that the influence of the clamp on the test results could thus be lowered.

##### <Laptop Extension Kit>

The extension is lightweight and made of POM, acrylic glass and foam. It fits easily on the upper part of the Mounting Device in place of the phone positioner. The extension is fully compatible with the Twin-SAM and ELI phantoms.



Picture 6: Device Holder

#### 10.4.5 Phantom

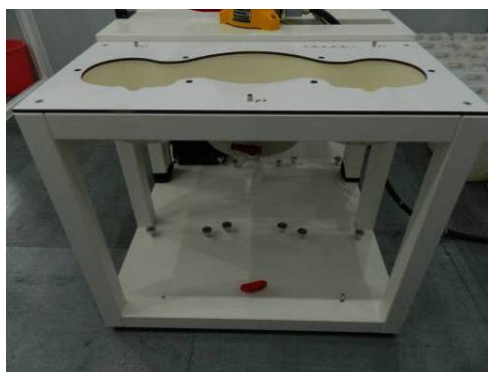
The SAM Twin Phantom V4.0 is constructed of a fiberglass shell integrated in a table. The shape of the shell is based on data from an anatomical study designed to Represent the 90<sup>th</sup> percentile of the population. The phantom enables the dissymmetric evaluation of SAR for both left and right handed handset usage, as well as body-worn usage using the flat phantom region. Reference markings on the Phantom allow the complete setup of all predefined phantom positions and measurement grids by manually teaching three points in the robot. The shell phantom has a 2mm shell thickness (except the ear region where shell thickness increases to 6 mm).

Shell Thickness:  $2 \pm 0.2 \text{ mm}$

Filling Volume: Approx. 25 liters

Dimensions: 810 x 1000 x 500 mm (H x L x W)

Available: Special



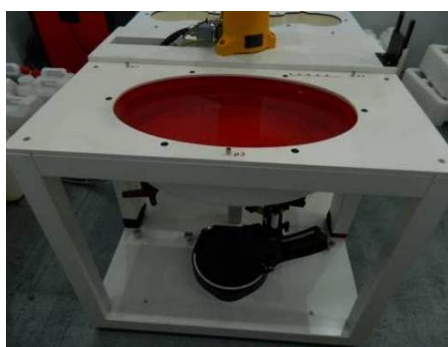
**Picture 7: SAM Twin Phantom**

Phantom for compliance testing of handheld and body-mounted wireless devices in the frequency range of 30 MHz to 6 GHz. ELI is fully compatible with the IEC 62209-2 standard and all known tissue simulating liquids. ELI has been optimized regarding its performance and can be integrated into our standard phantom tables. A cover prevents evaporation of the liquid. Reference markings on the phantom allow installation of the complete setup, including all predefined phantom positions and measurement grids, by teaching three points. The phantom is compatible with all SPEAG dosimetric probes and dipoles.

Shell Thickness  $2 \pm 0.2$  mm

Filling Volume Approx. 30 liters

Dimensions 190×600×0 mm (H x L x W)



**Picture 8.ELI4 Phantom**

### **10.5 SCANNING PROCEDURE**

The DASY5 installation includes predefined files with recommended procedures for measurements and validation. They are read-only document files and destined as fully defined but unmeasured masks. All test positions (head or body-worn) are tested with the same configuration of test steps differing only in the grid definition for the different test positions.

The “reference” and “drift” measurements are located at the beginning and end of the batch process. They measure the field drift at one single point in the liquid over the complete procedure. The indicated drift is mainly the variation of the DUT’s output power and should vary max.  $\pm 5$  %.

The “surface check” measurement tests the optical surface detection system of the DASY5 system by repeatedly detecting the surface with the optical and mechanical surface detector and comparing the results. The output gives the detecting heights of both systems, the difference between the two systems and the standard deviation of the detection repeatability. Air bubbles or refraction in the liquid due to separation of the sugar-water mixture gives poor repeatability (above  $\pm 0.1$ mm). To prevent wrong results tests are only executed when the liquid is free of air bubbles. The difference between the optical surface detection and the actual surface depends on the probe and is specified with each probe. (It does not depend on the surface reflectivity or the probe angle to the surface within  $\pm 30^\circ$ .)

## Area Scan

The Area Scan is used as a fast scan in two dimensions to find the area of high field values before running a detailed measurement around the hot spot. Before starting the area scan a grid spacing is set according to FCC KDB Publication 865664. During scan the distance of the probe to the phantom remains unchanged. After finishing area scan, the field maxima within a range of 2 dB will be ascertained.

## Zoom Scan

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.

## Spatial Peak Detection

The procedure for spatial peak SAR evaluation has been implemented and can determine values of masses of 1g and 10g, as well as for user-specific masses. The DASY5 system allows evaluations that combine measured data and robot positions, such as:

- maximum search
- extrapolation
- boundary correction
- peak search for averaged SAR

During a maximum search, global and local maxima searches are automatically performed in 2-D after each Area Scan measurement with at least 6 measurement points. It is based on the evaluation of the local SAR gradient calculated by the Quadratic Shepard's method. The algorithm will find the global maximum and all local maxima within -2 dB of the global maxima for all SAR distributions.

Extrapolation routines are used to obtain SAR values between the lowest measurement points and the inner phantom surface. The extrapolation distance is determined by the surface detection distance and the probe sensor offset. Several measurements at different distances are necessary for the extrapolation. Extrapolation routines require at least 10 measurement points in 3-D space.

They are used in the Zoom Scan to obtain SAR values between the lowest measurement points and the inner phantom surface. The routine uses the modified Quadratic Shepard's method for extrapolation.

A Z-axis scan measures the total SAR value at the x-and y-position of the maximum SAR value found during the cube scan. The probe is moved away in z-direction from the bottom of the SAM phantom in 5mm steps.

Table 1: Area and Zoom Scan Resolutions per FCC KDB Publication 865664 D01

| Frequency    | Maximum Area Scan Resolution (mm) ( $\Delta x_{area}$ , $\Delta y_{area}$ ) | Maximum Zoom Scan Resolution (mm) ( $\Delta x_{zoom}$ , $\Delta y_{zoom}$ ) | Maximum Zoom Scan Spatial Resolution (mm) $\Delta z_{zoom}(n)$ | Minimum Zoom Scan Volume (mm) (x,y,z) |
|--------------|---|---|--|---------------------------------------|
| $\leq 2$ GHz | $\leq 15$   | $\leq 8$  | $\leq 5$   | $\geq 30$                             |
| 2-3 GHz      | $\leq 12$   | $\leq 5$  | $\leq 5$   | $\geq 30$                             |
| 3-4 GHz      | $\leq 12$   | $\leq 5$  | $\leq 4$   | $\geq 28$                             |
| 4-5 GHz      | $\leq 10$   | $\leq 4$  | $\leq 3$   | $\geq 25$                             |
| 5-6 GHz      | $\leq 10$   | $\leq 4$  | $\leq 2$   | $\geq 22$                             |

## 10.6 DATA STORAGE AND EVALUATION

### 10.6.1 Data Storage

The DASY5 software stores the acquired data from the data acquisition electronics as raw data (in microvolt readings from the probe sensors), together with all necessary software parameters for the data evaluation (probe calibration data, liquid parameters and device frequency and modulation data) in measurement files with the extension “.DAE4”. The software evaluates the desired unit and format for output each time the data is visualized or exported. This allows verification of the complete software setup even after the measurement and allows correction of incorrect parameter settings. For example, if a measurement has been performed with a wrong crest factor parameter in the device set up, the parameter can be corrected afterwards and the data can be re-evaluated.

The measured data can be visualized or exported in different units or formats, depending on the selected probe type ([V/m], [A/m], [°C], [mW/g], [mW/cm²], [dBrel], etc.). Some of these units are not available in certain situations or show meaningless results, e.g., a SAR output in a lossless media will always be zero. Raw data can also be exported to perform the evaluation with other software packages.

### 10.6.2 Data Evaluation by SEMCAD

The SEMCAD software automatically executes the following procedures to calculate the field units from the microvolt readings at the probe connector. The parameters used in the evaluation are stored in the configuration modules of the software:

|                                  |   |
|----------------------------------|---|
| Probe parameters: - Sensitivity  | Norm <sub>i</sub> , a <sub>i0</sub> , a <sub>i1</sub> , a <sub>i2</sub> |
| - Conversion factor              | ConvF <sub>i</sub>  |
| - Diode compression point        | Dcp <sub>i</sub>  |
| Device parameters: - Frequency   | f   |
| - Crest factor                   | cf  |
| Media parameters: - Conductivity |   |
| - Density                        |   |

These parameters must be set correctly in the software. They can be found in the component documents or they can be imported into the software from the configuration files issued for the DASY5 components. In the direct measuring mode of the multimeter option, the parameters of the actual system setup are used. In the scan visualization and export modes, the parameters stored in the corresponding document files are used.

The first step of the evaluation is a linearization of the filtered input signal to account for the compression characteristics of the detector diode. The compensation depends on the input signal, the diode type and the DC-transmission factor from the diode to the evaluation electronics.

If the exciting field is pulsed, the crest factor of the signal must be known to correctly compensate for peak power. The formula for each channel can be given as:

$$V_i = U_i + U_i^2 \cdot c \cdot f / dcp_i$$

With  $V_i$  = compensated signal of channel  $i$  ( $i = x, y, z$ )

$U_i$  = input signal of channel  $i$  ( $i = x, y, z$ )

$cf$  = crest factor of exciting field (DASY parameter)

$dcp_i$  = diode compression point (DASY parameter)

From the compensated input signals the primary field data for each channel can be evaluated:

$$\text{E-field probes: } E_i = (V_i / \text{Norm}_i \cdot \text{ConvF})^{1/2}$$

$$\text{H-field probes: } H_i = (V_i)^{1/2} \cdot (a_{i0} + a_{i1} f + a_{i2} f^2) / f$$

With  $V_i$  = compensated signal of channel  $i$  ( $i = x, y, z$ )

**Norm<sub>i</sub>** = sensor sensitivity of channel i (i = x, y, z)

[mV/(V/m)<sup>2</sup>] for E-field Probes

**ConvF** = sensitivity enhancement in solution

**a<sub>ij</sub>** = sensor sensitivity factors for H-field probes

**f** = carrier frequency [GHz]

**E<sub>i</sub>** = electric field strength of channel i in V/m

**H<sub>i</sub>** = magnetic field strength of channel i in A/m

The RSS value of the field components gives the total field strength (Hermitian magnitude):

$$\mathbf{E}_{\text{tot}} = (\mathbf{E}_x^2 + \mathbf{E}_y^2 + \mathbf{E}_z^2)^{1/2}$$

The primary field data are used to calculate the derived field units.

$$\mathbf{SAR} = (\mathbf{E}_{\text{tot}})^2 \cdot \sigma / (\rho \cdot 1000)$$

with **SAR** = local specific absorption rate in mW/g

**E<sub>tot</sub>** = total field strength in V/m

= conductivity in [mho/m] or [Siemens/m]

= equivalent tissue density in g/cm<sup>3</sup>

Note that the density is normally set to 1 (or 1.06), to account for actual brain density rather than the density of the simulation liquid. The power flow density is calculated assuming the excitation field to be a free space field.

$$\mathbf{P}_{\text{pwe}} = \mathbf{E}_{\text{tot}}^2 / 3770 \text{ or } \mathbf{P}_{\text{pwe}} = \mathbf{H}_{\text{tot}}^2 \cdot 37.7$$

with **P<sub>pwe</sub>** = equivalent power density of a plane wave in mW/cm<sup>2</sup>

**E<sub>tot</sub>** = total electric field strength in V/m ; **H<sub>tot</sub>** = total magnetic field strength in A/m

## 10.7 TISSUE-EQUIVALENT LIQUID

### 10.7.1 Tissue-equivalent Liquid Ingredients

The liquid is consisted of water, salt and Glycol. The liquid has previously been proven to be suited for worst-case. The Table 3 shows the detail solution. It's satisfying the latest tissue dielectric parameters requirements proposed by the KDB 865664 D01.

Table 3: Composition of the Body Tissue Equivalent Matter

| MIXTURE%                           | FREQUENCY (Body) 2450MHz                |
|------------------------------------|---|
| Water                              | 73.2                                    |
| Glycol                             | 26.7                                    |
| Salt                               | 0.1                                     |
| Dielectric Parameters Target Value | f=2450MHz $\epsilon=52.7$ $\sigma=1.95$ |

### 10.7.2 Tissue-equivalent Liquid Properties

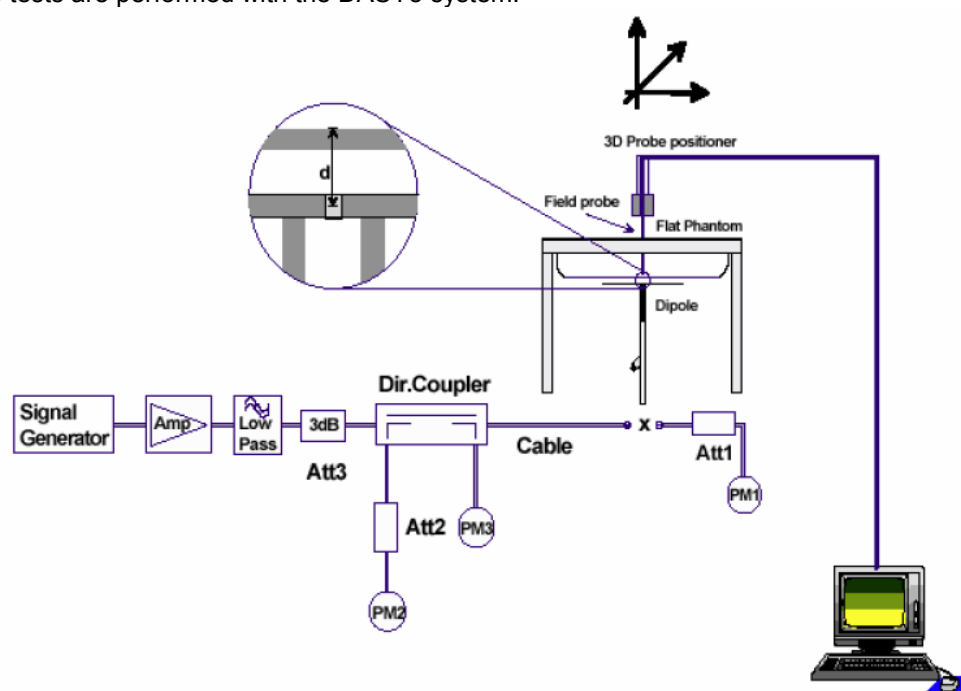
Table 4: Dielectric Performance of Tissue Simulating Liquid

| Test Date  | Frequency (MHz) | Tissue Type | Liquid Temp. (°C) | Conductivity ( $\sigma$ ) | Permittivity ( $\epsilon_r$ ) | Conductivity Target ( $\sigma$ ) | Permittivity Target ( $\epsilon_r$ ) | Delta ( $\sigma$ ) (%) | Delta ( $\epsilon_r$ ) (%) | Limit (%) |
|------------|-----------------|-------------|-------------------|---------------------------|-------------------------------|----------------------------------|--------------------------------------|------------------------|----------------------------|-----------|
| 2016.10.18 | 2450            | Body        | 22.6              | 2.020                     | 50.710                        | 1.95                             | 52.70                                | 3.59                   | -3.78                      | ±5        |
| 2016.10.18 | 2450            | head        | 22.6              | 1.880                     | 39.970                        | 1.80                             | 39.20                                | 4.44                   | 1.96                       | ±5        |

## 10.8 SYSTEM CHECK

### 10.8.1 Description of System Check

The manufacturer calibrates the probes annually. Dielectric parameters of the tissue simulants were measured every day using the dielectric probe kit and the network analyzer. A system check measurement was made following the determination of the dielectric parameters of the simulant, using the dipole validation kit. A power level of 250 mW was supplied to the dipole antenna, which was placed under the flat section of the twin SAM phantom. The system check results (dielectric parameters and SAR values) are given in the table 6. System check results have to be equal or near the values determined during dipole calibration with the relevant liquids and test system ( $\pm 10\%$ ). System check is performed regularly on all frequency bands where tests are performed with the DASY5 system.



Picture 10. System Check Set-up

#### Justification for Extended SAR Dipole Calibrations

Usage of SAR dipoles calibrated less than 3 years ago but more than 1 year ago were confirmed in maintaining return loss ( $< -20$  dB, within 20% of prior calibration) and impedance (within 5 ohm from prior calibration) requirements per extended calibrations in KDB 865664 D01 v01r04:

Table 5: Antenna Parameters with Body Tissue Simulating Liquid

| Dipole D2450V2 SN: 927 |                 |             |                        |                 |
|------------------------|-----------------|-------------|------------------------|-----------------|
| Head Liquid            |                 |             |                        |                 |
| Date of Measurement    | Return Loss(dB) | $\Delta \%$ | Impedance ( $\Omega$ ) | $\Delta \Omega$ |
| 2014-1-13              | -24.935         | /           | 55.234                 | /               |
| 2015-1-11              | -24.769         | 0.67        | 54.383                 | -0.851          |
| 2016-1-9               | -25.103         | -1.35       | 55.376                 | 0.993           |
| Body Liquid            |                 |             |                        |                 |
| Date of Measurement    | Return Loss(dB) | $\Delta \%$ | Impedance ( $\Omega$ ) | $\Delta \Omega$ |
| 2014-1-13              | -26.331         | /           | 51.422                 | /               |
| 2015-1-11              | -26.153         | 0.68        | 51.016                 | -0.406          |
| 2016-1-9               | -26.386         | -0.89       | 51.468                 | 0.452           |

## 10.8.2 System Check Results

Table 6: System Check for Head /BodyTissue Simulating Liquid

| Date       | Frequency (MHz) | Tissue Type | Input Power (mW) | Dipole S/N | Probe S/N | DAE S/N | Measured 1g SAR (W/kg) | Targeted 1g SAR (W/kg) | Normalized 1g SAR (W/kg) | Deviation (%) |
|------------|-----------------|-------------|------------------|------------|-----------|---------|------------------------|------------------------|--------------------------|---------------|
| 2016.10.18 | 2450            | Body        | 250              | 927        | 3873      | 1341    | 12.70                  | 50.40                  | 50.8                     | 0.79          |
| 2016.10.18 | 2450            | head        | 250              | 927        | 3873      | 1341    | 13.50                  | 53.20                  | 54                       | 1.50          |



Test Laboratory: EMTEK (Shenzhen) Co.,Ltd.

Date/Time: 18.10.2016

### SystemPerformanceCheck-D2450V2-MSL-161018

Communication System: UID 0, CW (0); Frequency: 2450 MHz;Duty Cycle: 1:1

Medium: MSL2450

Medium parameters used:  $f = 2450$  MHz;  $\sigma = 2.02$  S/m;  $\epsilon_r = 50.71$ ;  $\rho = 1000$  kg/m<sup>3</sup>

Ambient Temperature: 22.6 °C; Liquid Temperature: 22.5 °C

DASY Configuration:

- Probe: EX3DV4 - SN3970; ConvF(7.57, 7.57, 7.57); Calibrated: 07.09.2016;
- Sensor-Surface: 2mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn1418; Calibrated: 05.09.2016
- Phantom: ELI v5.0; Type: QDOVA002AA; Serial: TP:1231
- DASY52 52.8.7(1137); SEMCAD X 14.6.10(7164)

**System Performance Check at Frequency at 2450MHz/d=10mm, Pin=250mW, dist=2.0mm (EX-Probe)/Area Scan (41x61x1):** Interpolated grid: dx=12mm, dy=12mm  
Maximum value of SAR (interpolated) = 17.8 W/kg

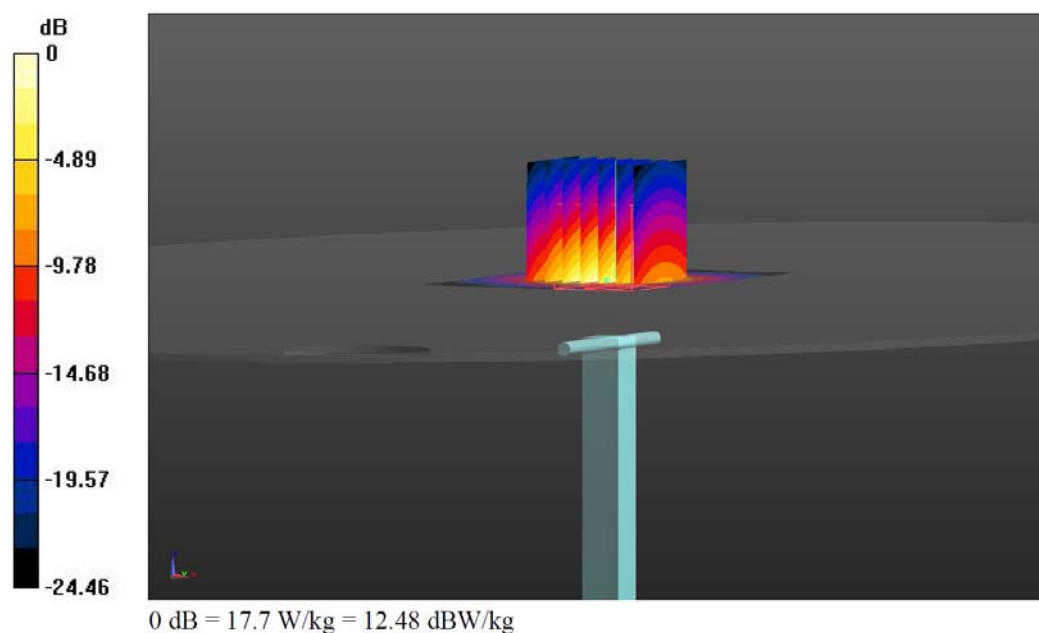
**System Performance Check at Frequency at 2450MHz/d=10mm, Pin=250mW, dist=2.0mm (EX-Probe)/Zoom Scan (7x7x7)/Cube 0:** Measurement grid: dx=5mm, dy=5mm, dz=5mm

Reference Value = 91.496 V/m; Power Drift = 0.05 dB

Peak SAR (extrapolated) = 24.9 W/kg

**SAR(1 g) = 12.7 W/kg; SAR(10 g) = 4.99 W/kg**

Maximum value of SAR (measured) = 17.7 W/kg



Test Laboratory: EMTEK (Shenzhen) Co.,Ltd.

Date/Time: 18.10.2016

## SystemPerformanceCheck-D2450V2-HSL-161018

Communication System: UID 0, CW (0); Frequency: 2450 MHz;Duty Cycle: 1:1

Medium: HSL2450

Medium parameters used:  $f = 2450$  MHz;  $\sigma = 1.88$  S/m;  $\epsilon_r = 37.97$ ;  $\rho = 1000$  kg/m<sup>3</sup>

Ambient Temperature: 22.6 °C; Liquid Temperature: 22.5 °C

DASY Configuration:

- Probe: EX3DV4 - SN3970; ConvF(7.63, 7.63, 7.63); Calibrated: 07.09.2016;
- Sensor-Surface: 2mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn1418; Calibrated: 05.09.2016
- Phantom: SAM; Type: QD000P40CD; Serial: TP:1794
- DASY52 52.8.7(1137); SEMCAD X 14.6.10(7164)

**System Performance Check at Frequency at 2450MHz/d=10mm, Pin=250mW, dist=2.0mm (EX-Probe)/Area Scan (41x61x1):** Interpolated grid: dx=12mm, dy=12mm  
Maximum value of SAR (interpolated) = 18.1 W/kg

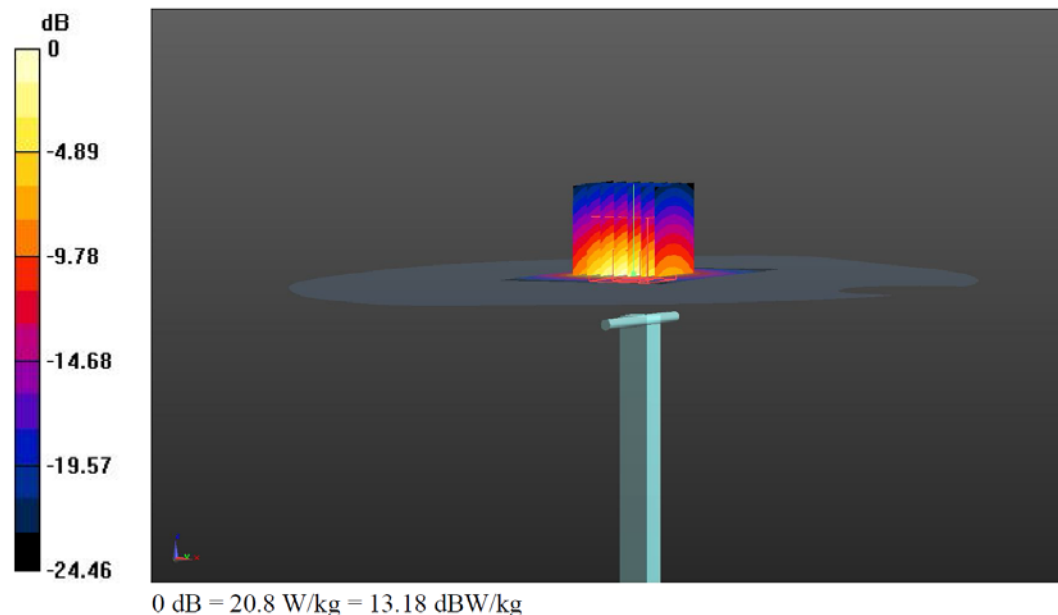
**System Performance Check at Frequency at 2450MHz/d=10mm, Pin=250mW, dist=2.0mm (EX-Probe)/Zoom Scan (7x7x7)/Cube 0:** Measurement grid: dx=5mm, dy=5mm, dz=5mm

Reference Value = 95.9 V/m; Power Drift = -0.05 dB

Peak SAR (extrapolated) = 28.9 W/kg

**SAR(1 g) = 13.3 W/kg; SAR(10 g) = 5.13 W/kg**

Maximum value of SAR (measured) = 20.8 W/kg



### 10.8.3 System Validation

The SAR system must be validated against its performance specifications before it is deployed. When SAR probes, system components or software are changed, upgraded or recalibrated, these must be validated with the SAR system(s) that operates with such components.

Table 7: System Validation Part 1

| System No. | Probe SN. | Liquid Name    | Validation Date | Frequency Point | Permittivity $\epsilon$ | Conductivity $\sigma$ (s/m) |
|------------|-----------|----------------|-----------------|-----------------|-------------------------|-----------------------------|
| 1          | 3970      | 2450MHz (body) | 2016.9.07       | 2450MHz         | 52.70                   | 1.95                        |

Table 8: System Validation Part 2

|               |                 |      |      |
|---------------|-----------------|------|------|
| CW Validation | Sensitivity     | PASS | PASS |
|               | Probe Linearity | PASS | PASS |
|               | Probe Isotropy  | PASS | PASS |
|               | MOD. Type       | OFDM | OFDM |
|               | Duty Factor     | PASS | PASS |
|               | PAR             | PASS | PASS |

## 11 MEASUREMENT PROCEDURES

### 11.1 GENERAL DESCRIPTION OF TEST PROCEDURES

For WLAN SAR testing, WLAN engineering testing software installed on the EUT can provide continuous transmitting RF signal. This RF signal utilized in SAR measurement has almost 100% duty cycle and its crest factor is 1.

For the 802.11b/g/n SAR tests, a communication link is set up with the test mode software for WIFI mode test. During the test, at the each test frequency channel, the EUT is operated at the RF continuous emission mode.

### 11.2 MEASUREMENT VARIABILITY

Per FCC KDB Publication 865664 D01, SAR measurement variability was assessed for each frequency band, which was determined by the SAR probe calibration point and tissue-equivalent medium used for the device measurements. When both head and body tissue-equivalent media were required for SAR measurements in a frequency band, the variability measurement procedures were applied to the tissue medium with the highest measured SAR, using the highest measured SAR configuration for that tissue-equivalent medium. These additional measurements were repeated after the completion of all measurements requiring the same head or body tissue-equivalent medium in a frequency band. The test device was returned to ambient conditions (normal room temperature) with the battery fully charged before it was re-mounted on the device holder for the repeated measurement(s) to minimize any unexpected variations in the repeated results.

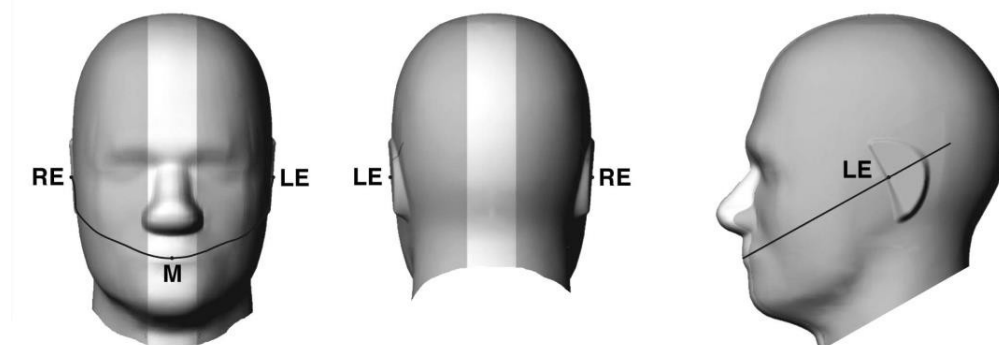
SAR Measurement Variability was assessed using the following procedures for each frequency band:

- 1) When the original highest measured SAR is  $\geq 0.80$  W/kg, the measurement was repeated once.
- 2) A second repeated measurement was performed only if the ratio of largest to smallest SAR for the original and first repeated measurements was  $> 1.20$  or when the original or repeated measurement was  $\geq 1.45$  W/kg ( $\sim 10\%$  from the 1-g SAR limit).
- 3) A third repeated measurement was performed only if the original, first or second repeated measurement was  $\geq 1.5$  W/kg and the ratio of largest to smallest SAR for the original, first and second repeated measurements is  $> 1.20$ .
- 4) Repeated measurements are not required when the original highest measured SAR is  $< 0.80$  W/kg.

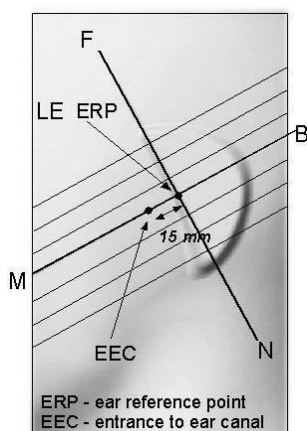
### 11.3 TEST POSITIONS REQUIREMENTS

(16) Ear and handset reference point

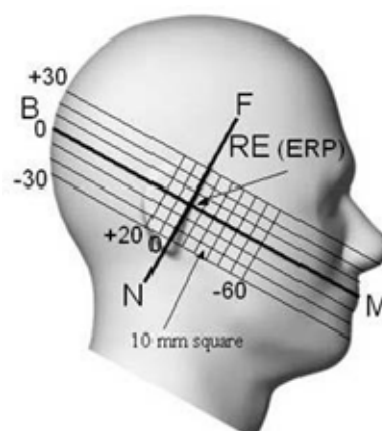
Picture11 shows the front, back, and side views of the SAM phantom. The center-of-mouth reference point is labeled "M," the left ear reference point (ERP) is marked "LE," and the right ERP is marked "RE." Each ERP is 15 mm along the B-M (back-mouth) line behind the entrance-to-ear-canal (EEC) point, as shown in Picture12. The Reference Plane is defined as passing through the two ear reference points and point M. The line N-F (neck-front), also called the reference pivoting line, is normal to the Reference Plane and perpendicular to both a line passing through RE and LE and the B-M line (see Picture13). Both N-F and B-M lines should be marked on the exterior of the phantom shell to facilitate handset positioning. Posterior to the N-F line the ear shape is a flat surface with 6 mm thickness at each ERP, and forward of the N-F line the ear is truncated, as illustrated in Picture12. The ear truncation is introduced to preclude the ear lobe from interfering with handset tilt, which could lead to unstable positioning at the cheek.



Picture11 Front, back, and side views of SAM twin phantom



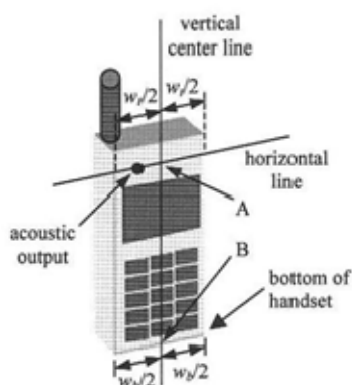
Picture12 Close-up side view of phantom showing the ear region.



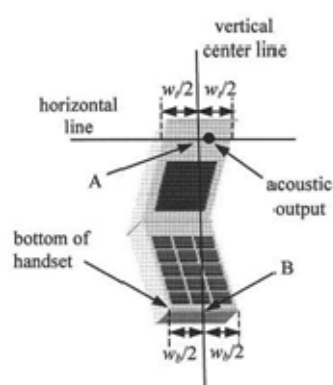
Picture13 Side view of the phantom showing relevant markings and seven cross-sectional plane locations

## (2) Definition of the cheek position

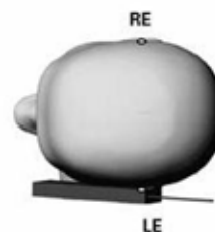
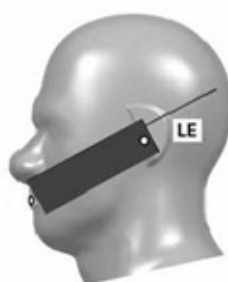
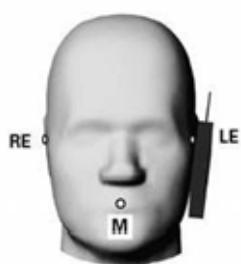
1. Ready the handset for talk operation, if necessary. For example, for handsets with a cover piece (flip cover), open the cover. If the handset can transmit with the cover closed, both configurations must be tested.
2. Define two imaginary lines on the handset—the vertical centerline and the horizontal line. The vertical centerline passes through two points on the front side of the handset—the midpoint of the width  $w_t$  of the handset at the level of the acoustic output (point A in Picture 14 and Picture 15), and the midpoint of the width  $w_b$  of the bottom of the handset (point B). The horizontal line is perpendicular to the vertical centerline and passes through the center of the acoustic output (see Picture 14). The two lines intersect at point A. Note that for many handsets, point A coincides with the center of the acoustic output; however, the acoustic output may be located elsewhere on the horizontal line. Also note that the vertical centerline is not necessarily parallel to the front face of the handset (see Picture 15), especially for clamshell handsets, handsets with flip covers, and other irregularly-shaped handsets.
3. Position the handset close to the surface of the phantom such that point A is on the (virtual) extension of the line passing through points RE and LE on the phantom (see Picture 16), such that the plane defined by the vertical centerline and the horizontal line of the handset is approximately parallel to the sagittal plane of the phantom.
4. Translate the handset towards the phantom along the line passing through RE and LE until handset point A touches the pinna at the ERP.
5. While maintaining the handset in this plane, rotate it around the LE-RE line until the vertical centerline is in the plane normal to the plane containing B-M and N-F lines, i.e., the Reference Plane.
6. Rotate the handset around the vertical centerline until the handset (horizontal line) is parallel to the N-F line.
7. While maintaining the vertical centerline in the Reference Plane, keeping point A on the line passing through RE and LE, and maintaining the handset contact with the pinna, rotate the handset about the N-F line until any point on the handset is in contact with a phantom point below the pinna on the cheek. See Picture 16. The actual rotation angles should be documented in the test report.



Picture14 Handset vertical and horizontal reference lines—"fixed case"



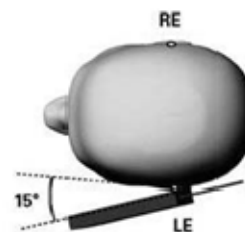
Picture15 Handset vertical and horizontal reference lines—"clam-shell case"



Picture16 cheek or touch position. The reference points for the right ear (RE), left ear (LE), and mouth (M), which establish the Reference Plane for handset positioning, are indicated.

### (3) Definition of the tilt position

1. Ready the handset for talk operation, if necessary. For example, for handsets with a cover piece (flip cover), open the cover. If the handset can transmit with the cover closed, both configurations must be tested.
2. While maintaining the orientation of the handset, move the handset away from the pinna along the line passing through RE and LE far enough to allow a rotation of the handset away from the cheek by 15°.
3. Rotate the handset around the horizontal line by 15°.
4. While maintaining the orientation of the handset, move the handset towards the phantom on the line passing through RE and LE until any part of the handset touches the ear. The tilt position is obtained when the contact point is on the pinna. See Picture 17. If contact occurs at any location other than the pinna, e.g., the antenna at the back of the phantom head, the angle of the handset should be reduced. In this case, the tilt position is obtained if any point on the handset is in contact with the pinna and a second point



Picture17 Tilt position. The reference points for the right ear (RE), left ear (LE), and mouth (M), which define the Reference Plane for handset positioning, are indicated.

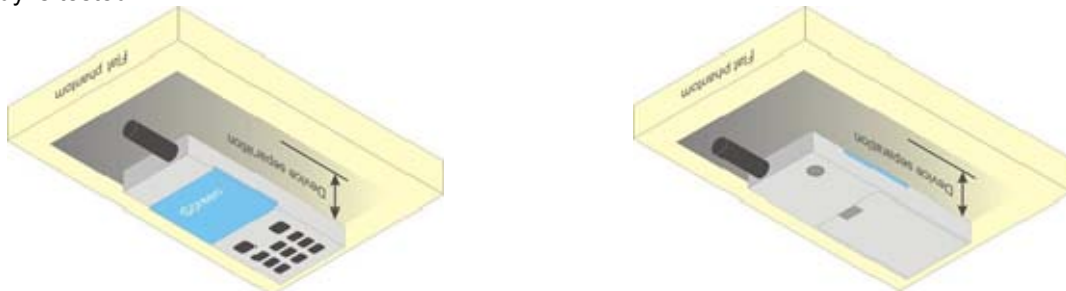
### (4) Body Worn Accessory

Body-worn operating configurations are tested with the belt-clips and holsters attached to the device and positioned against a flat phantom in a normal use configuration (see Picture 18). Per KDB 648474 D04v01r03, body-worn accessory exposure is typically related to voice mode operations when handsets are



carried in body-worn accessories. The body-worn accessory procedures in FCC KDB 447498 D01v06 should be used to test for body-worn accessory SAR compliance, without a headset connected to it. This enables the test results for such configuration to be compatible with that required for hotspot mode when the body-worn accessory test separation distance is greater than or equal to that required for hotspot mode, when applicable. When the reported SAR for body-worn accessory, measured without a headset connected to the handset is  $< 1.2 \text{ W/kg}$ , the highest reported SAR configuration for that wireless mode and frequency band should be repeated for that body-worn accessory with a headset attached to the handset.

Accessories for body-worn operation configurations are divided into two categories: those that do not contain metallic components and those that do contain metallic components and those that do contain metallic components. When multiple accessories that do not contain metallic components are supplied with the device, the device is tested with only the accessory that dictates the closest spacing to the body. Then multiple accessories that contain metallic components are test with the device with each accessory. If multiple accessories share an identical metallic component (i.e. the same metallic belt-clip used with different holsters with no other metallic components) only the accessory that dictates the closest spacing to the body is tested.



Picture18 Body Worn Position

#### (5)Wireless Router

Some battery-operated handsets have the capability to transmit and receive user through simultaneous transmission of WIFI simultaneously with a separate licensed transmitter. The FCC has provided guidance in FCC HDB Publication 941225 D06v02r01 where SAR test considerations for handsets ( $L \times W \geq 9 \text{ cm} \times 5 \text{ cm}$ ) are based on a composite test separation distance of 10mm from the front, back and edges of the device containing transmitting antennas within 2.5cm of their edges, determined from general mixed use conditions for this type of devices. Since the hotspot SAR results may overlap with the body-worn accessory SAR requirements, the more conservative configurations can be considered, thus excluding some body-worn accessory SAR tests.

When the user enables the personal wireless router functions for the handset, actual operations include simultaneous transmission of both the WIFI transmitter and another licensed transmitter. Both transmitters often do not transmit at the same transmitting frequency and thus cannot be evaluated for SAR under actual use conditions due to the limitations of the SAR assessment probes. Therefore, SAR must be evaluated for each frequency transmission and mode separately and spatially summed with the WIFI transmitter according to FCC KDB Publication 447498 D01v06 publication procedures. The "Portable Hotspot" feature on the handset was NOT activated during SAR assessments, to ensure the SAR measurements were evaluated for a single transmission frequency RF signal at a time.

## 11.4 TEST RESULTS

### 11.4.1 Conducted Power Results

The output average power of WiFi 2.4G is as following:

| Mode     | Channel | Data rate (Mbps) | Power Setting | Average Power (dBm) |
|----------|---------|------------------|---------------|---------------------|
| 11b      | 1       | 1                | -             | 16.46               |
|          | 6       | 1                | -             | 15.03               |
|          | 11      | 1                | -             | 14.88               |
| 11g      | 1       | 6                | -             | 14.15               |
|          | 6       | 6                | -             | 13.54               |
|          | 11      | 6                | -             | 12.65               |
| 11n HT20 | 1       | MCS0             | -             | 12.53               |
|          | 6       | MCS0             | -             | 12.32               |
|          | 11      | MCS0             | -             | 12.16               |

Note: The maximum average output power at higher data rates is smaller than those measured at the lowest data rate.



## 11.4.2 SAR TEST RESULTS

SAR Values for WLAN2.4G 802.11b:

| Test Position | Gap (cm) | Ch | Freq. (MHz) | Configure | Average Power (dBm) | Tune-up Limit (dBm) | Tune-up Scaling Factor | Power Drift (Db) | Measured 1g SAR (W/kg) | Reported 1g SAR (W/kg) | Note |
|---------------|----------|----|-------------|-----------|---------------------|---------------------|------------------------|------------------|------------------------|------------------------|------|
| Front Face    | 0        | 1  | 2412        | 1Mbps     | 16.50               | 17.00               | 1.122                  | -0.03            | 0.218                  | 0.245                  | body |
| Bottom Face   | 0        | 1  | 2412        | 1Mbps     | 16.50               | 17.00               | 1.122                  | -0.02            | 0.182                  | 0.204                  | body |
| Edge 1        | 0        | 1  | 2412        | 1Mbps     | 16.50               | 17.00               | 1.122                  | 0.04             | 0.026                  | 0.029                  | body |
| Edge 2        | 0        | 1  | 2412        | 1Mbps     | 16.50               | 17.00               | 1.122                  | 0.03             | 0.024                  | 0.027                  | body |
| Edge 3        | 0        | 1  | 2412        | 1Mbps     | 16.50               | 17.00               | 1.122                  | -0.01            | 0.069                  | 0.077                  | body |
| Edge 4        | 0        | 1  | 2412        | 1Mbps     | 16.50               | 17.00               | 1.122                  | 0.05             | 0.099                  | 0.111                  | body |
| Front Face    | 0        | 6  | 2437        | 1Mbps     | 16.50               | 17.00               | 1.122                  | -0.03            | 0.179                  | 0.192                  | body |
| Front Face    | 0        | 11 | 2462        | 1Mbps     | 16.50               | 17.00               | 1.122                  | -0.05            | 0.117                  | 0.131                  | body |
| Front Face    | 0        | 1  | 2412        | 1Mbps     | 16.50               | 17.00               | 1.122                  | 0.03             | 0.229                  | 0.257                  | head |
| Bottom Face   | 0        | 1  | 2412        | 1Mbps     | 16.50               | 17.00               | 1.122                  | -0.04            | 0.224                  | 0.251                  | head |
| Edge 1        | 0        | 1  | 2412        | 1Mbps     | 16.50               | 17.00               | 1.122                  | 0.01             | 0.021                  | 0.024                  | head |
| Edge 2        | 0        | 1  | 2412        | 1Mbps     | 16.50               | 17.00               | 1.122                  | 0.06             | 0.103                  | 0.116                  | head |
| Edge 3        | 0        | 1  | 2412        | 1Mbps     | 16.50               | 17.00               | 1.122                  | 0.05             | 0.108                  | 0.121                  | head |
| Edge 4        | 0        | 1  | 2412        | 1Mbps     | 16.50               | 17.00               | 1.122                  | 0.02             | 0.108                  | 0.121                  | head |
| Front Face    | 0        | 6  | 2437        | 1Mbps     | 16.50               | 17.00               | 1.122                  | 0.05             | 0.188                  | 0.211                  | head |
| Front Face    | 0        | 11 | 2462        | 1Mbps     | 16.50               | 17.00               | 1.122                  | 0.01             | 0.215                  | 0.241                  | head |

Note:

- The value with red color is the maximum SAR Value of each test band.
- SAR test reduction and exclusion guidance
  - The SAR exclusion threshold for distances <50mm is defined by the following equation:  

$$(\text{max. power of channel, including tune-up tolerance, mW}) / (\text{min. test separation distance, mm}) \leq 3.0$$
  - The SAR exclusion threshold for distances >50mm is defined by the following equation, as illustrated in KDB 447498 D01 Appendix B:
    - at 100 MHz to 1500 MHz  

$$[(\text{Power allowed at numeric Threshold at 50 mm in step 1}) + (\text{test separation distance} - 50 \text{ mm}) \cdot (\text{f (MHz)} / 150)] \text{ mW}$$
    - at > 1500 MHz and ≤ 6 GHz  

$$[(\text{Power allowed at numeric Threshold at 50 mm in step 1}) + (\text{test separation distance} - 50 \text{ mm}) \cdot 10] \text{ mW}$$
- Per KDB 447498 D01v06, the reported SAR is the measured SAR value adjusted for maximum tune-up tolerance.
  - Tune-up scaling Factor = tune-up limit power (mW) / EUT RF power (mW), where tune-up limit is the maximum rated power among all production units.
  - Reported SAR(W/kg)= Measured SAR(W/kg)\*Tune-up Scaling Factor.
- Per KDB 447498 D01v06, for each exposure position, 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
- Repeated measurements are not required when the original highest measured SAR is < 0.80 W/kg.

## 2.4 GHz OFDM conditions:

|      | maximum output power |           | Scaling Factor | Maximum SAR of DSSS (W/kg) | adjusted SAR (W/kg) |
|------|----------------------|-----------|----------------|----------------------------|---------------------|
|      | DSSS(dBm)            | OFDM(dBm) |                |                            |                     |
| Body | 16.5                 | 15        | 1.1            | 0.218                      | 0.198               |
| Head | 16.5                 | 15        | 1.1            | 0.229                      | 0.208               |

## Note:

1. SAR is not required for the following 2.4 GHz OFDM conditions.
  - 1) When KDB Publication 447498 SAR test exclusion applies to the OFDM configuration.
  - 2) When the highest reported SAR for DSSS is adjusted by the ratio of OFDM to DSSS specified maximum output power and the adjusted SAR is  $\leq 1.2$  W/kg.

### 11.4.3 TEST GRAPH RESULTS:

Test Laboratory: EMTEK (Shenzhen) Co.,Ltd.

Date/Time: 18.10.2016

#### 01-WLAN2.4G-802.11b-1Mbps-front Face-0cm-Ch1

Communication System: UID 0, WIFI (0); Frequency: 2412 MHz;Duty Cycle: 1:1

Medium: MSL\_2450\_161018

Medium parameters used:  $f = 2412$  MHz;  $\sigma = 1.968$  S/m;  $\epsilon_r = 53.191$ ;  $\rho = 1000$  kg/m<sup>3</sup>

Ambient Temperature: 22.6 °C; Liquid Temperature: 22.5 °C

DASY Configuration:

- Probe: EX3DV4 - SN3970; ConvF(7.57, 7.57, 7.57); Calibrated: 07.09.2016;
- Sensor-Surface: 2mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn1418; Calibrated: 05.09.2016
- Phantom: ELI v5.0; Type: QDOVA002AA; Serial: TP:1231
- DASY52 52.8.7(1137); SEMCAD X 14.6.10(7164)

**Configuration/Ch1/Area Scan (41x61x1):** Interpolated grid: dx=12mm, dy=12mm

Maximum value of SAR (interpolated) = 0.375 W/kg

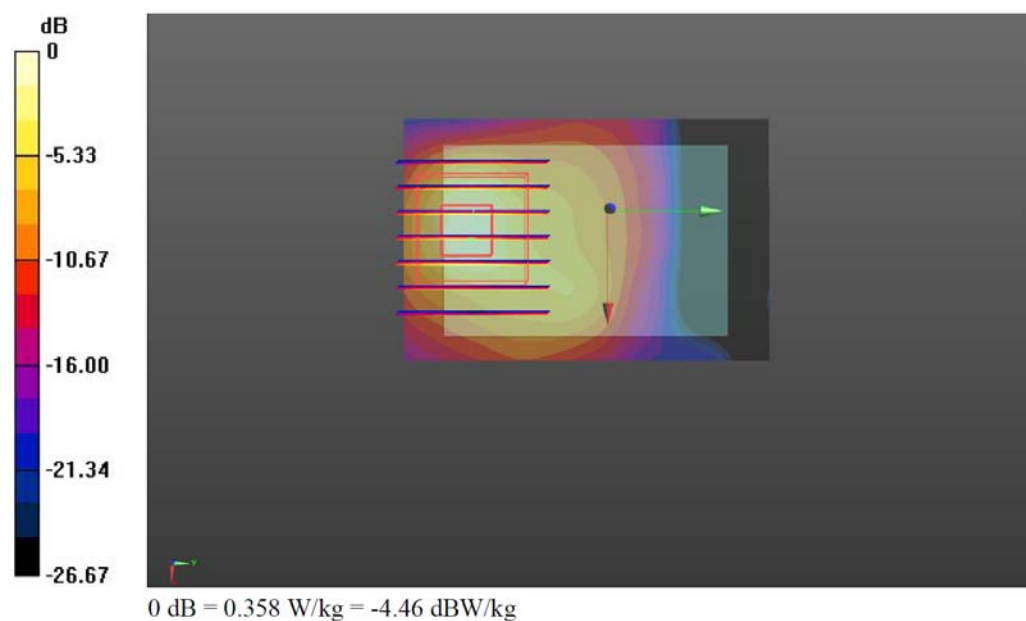
**Configuration/Ch1/Zoom Scan (7x7x7)/Cube 0:** Measurement grid: dx=5mm, dy=5mm, dz=5mm

Reference Value = 5.443 V/m; Power Drift = -0.03 dB

Peak SAR (extrapolated) = 0.590 W/kg

**SAR(1 g) = 0.218 W/kg; SAR(10 g) = 0.077 W/kg**

Maximum value of SAR (measured) = 0.358 W/kg



Test Laboratory: EMTEK (Shenzhen) Co.,Ltd.

Date/Time: 18.10.2016

## 09-WLAN2.4G-802.11b-1Mbps-front Face-0cm-Ch1-head

Communication System: UID 0, WIFI (0); Frequency: 2412 MHz; Duty Cycle: 1:1

Medium: HSL\_2450\_161018

Medium parameters used:  $f = 2412$  MHz;  $\sigma = 1.812$  S/m;  $\epsilon_r = 40.969$ ;  $\rho = 1000$  kg/m<sup>3</sup>

Ambient Temperature: 22.6 °C; Liquid Temperature: 22.5 °C

DASY Configuration:

- Probe: EX3DV4 - SN3970; ConvF(7.63, 7.63, 7.63); Calibrated: 07.09.2016;
- Sensor-Surface: 2mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn1418; Calibrated: 05.09.2016
- Phantom: ELI v5.0; Type: QDOVA002AA; Serial: TP:1231
- DASY52 52.8.7(1137); SEMCAD X 14.6.10(7164)

**Configuration/Ch1/Area Scan (41x61x1):** Interpolated grid: dx=12mm, dy=12mm

Maximum value of SAR (interpolated) = 0.369 W/kg

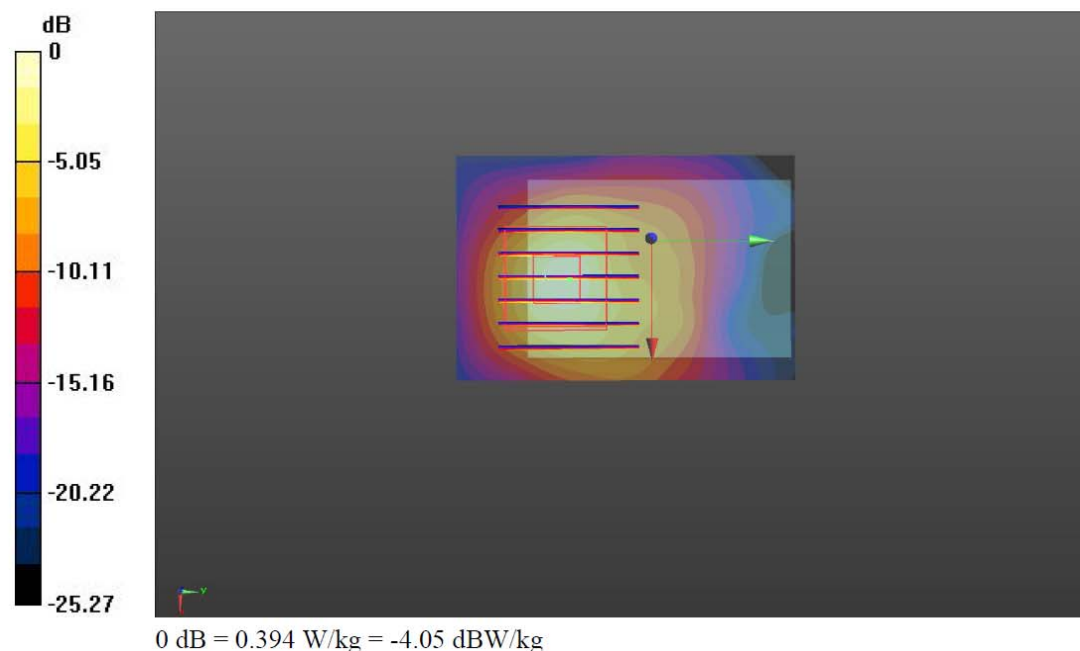
**Configuration/Ch1/Zoom Scan (7x7x7)/Cube 0:** Measurement grid: dx=5mm, dy=5mm, dz=5mm

Reference Value = 5.317 V/m; Power Drift = 0.03 dB

Peak SAR (extrapolated) = 0.663 W/kg

**SAR(1 g) = 0.229 W/kg; SAR(10 g) = 0.081 W/kg**

Maximum value of SAR (measured) = 0.394 W/kg



## 12 700MHZ TO 3GHZ MEASUREMENT UNCERTAINTY

The component of uncertainty may generally be categorized according to the methods used to evaluate them. The evaluation of uncertainty by the statistical analysis of a series of observations is termed a Type A evaluation of uncertainty. The evaluation of uncertainty by means other than the statistical analysis of a series of observation is termed a Type B evaluation of uncertainty. Each component of uncertainty, however evaluated, is represented by an estimated standard deviation, termed standard uncertainty, which is determined by the positive square root of the estimated variance.

A Type A evaluation of standard uncertainty may be based on any valid statistical method for treating data. This includes calculating the standard deviation of the mean of a series of independent observations; using the method of least squares to fit a curve to the data in order to estimate the parameter of the curve and their standard deviations; or carrying out an analysis of variance in order to identify and quantify random effects in certain kinds of measurement.

A type B evaluation of standard uncertainty is typically based on scientific judgment using all of the relevant information available. These may include previous measurement data, experience, and knowledge of the behavior and properties of relevant materials and instruments, manufacture's specification, data provided in calibration reports and uncertainties assigned to reference data taken from handbooks. Broadly speaking, the uncertainty is either obtained from an outdoor source or obtained from an assumed distribution, such as the normal distribution, rectangular or triangular distributions indicated in table below.

| Uncertainty Distributions          | Normal      | Rectangluar  | Triangular   | U-Shape      |
|------------------------------------|-------------|--------------|--------------|--------------|
| Multi-plying Factor <sup>(a)</sup> | $1/K^{(b)}$ | $1/\sqrt{3}$ | $1/\sqrt{6}$ | $1/\sqrt{2}$ |

(a) standard uncertainty is determined as the product of the multiplying factor and the estimated range of variations in the measured quantity

(b) K is the coverage factor

Table 12 Standard Uncertainty for Assumed Distribution

The combined standard uncertainty of the measurement result represents the estimated standard deviation of the result. It is obtained by combining the individual standard uncertainties of both Type A and Type B evaluation using the usual "root-sum-squares" (RSS) methods of combining standard deviations by taking the positive square root of the estimated variances.

Expanded uncertainty is a measure of uncertainty that defines an interval about the measurement result within which the measured value is confidently believed to lie. It is obtained by multiplying the combined standard uncertainty by a coverage factor. Typically, the coverage factor ranges from 2 to 3. Using a coverage factor allows the true value of a measured quantity to be specified with a defined probability within the specified uncertainty range. For purpose of this document, a coverage factor two is used, which corresponds to confidence interval of about 95 %. The DASY uncertainty Budget is shown in the following tables.

| No.  | Description                                     | Type  | Uncertainty Value(%) | Probability Distribution | Div.       | (Ci) 1g | (Ci) 10g | Std. Unc. (1g) | Std. Unc. (10g) | Degree of freedom |
|--|---|---|----------------------|--------------------------|------------|---------|----------|----------------|-----------------|-------------------|
| <b>Measurement system</b>                          |   |   |                      |                          |            |         |          |                |                 |                   |
| 1  | Probe calibration                               | B   | 6                    | N                        | 1          | 1       | 1        | 6              | 6               | ∞                 |
| 2  | Isotropy  | B   | 3.0                  | R                        | $\sqrt{3}$ | 0.7     | 0.7      | 1.2            | 1.2             | ∞                 |
| 3  | Boundary effect                                 | B   | 1.0                  | R                        | $\sqrt{3}$ | 1       | 1        | 0.6            | 0.6             | ∞                 |
| 4  | Linearity                                       | B   | 4.7                  | R                        | $\sqrt{3}$ | 1       | 1        | 2.7            | 2.7             | ∞                 |
| 5  | Detection limit                                 | B   | 1.0                  | N                        | 1          | 1       | 1        | 0.6            | 0.6             | ∞                 |
| 6  | Readout electronics                             | B   | 0.3                  | R                        | $\sqrt{3}$ | 1       | 1        | 0.3            | 0.3             | ∞                 |
| 7  | Response time                                   | B   | 0.8                  | R                        | $\sqrt{3}$ | 1       | 1        | 0.5            | 0.5             | ∞                 |
| 8  | Integration time                                | B   | 2.6                  | R                        | $\sqrt{3}$ | 1       | 1        | 1.5            | 1.5             | ∞                 |
| 9  | RF ambient conditions-noise                     | B   | 0                    | R                        | $\sqrt{3}$ | 1       | 1        | 0              | 0               | ∞                 |
| 10   | RF ambient conditions-reflection                | B   | 0                    | R                        | $\sqrt{3}$ | 1       | 1        | 0              | 0               | ∞                 |
| 11   | Probe positioned mech. restrictions             | B   | 0.4                  | R                        | $\sqrt{3}$ | 1       | 1        | 0.2            | 0.2             | ∞                 |
| 12   | Probe positioning with respect to phantom shell | B   | 2.9                  | R                        | $\sqrt{3}$ | 1       | 1        | 1.7            | 1.7             | ∞                 |
| 13   | Post-processing                                 | B   | 1.0                  | R                        | $\sqrt{3}$ | 1       | 1        | 0.6            | 0.6             | ∞                 |
| <b>Test sample related</b>                         |   |   |                      |                          |            |         |          |                |                 |                   |
| 14   | Test sample positioning                         | A   | 3.3                  | N                        | 1          | 1       | 1        | 3.3            | 3.3             | 71                |
| 15   | Device holder uncertainty                       | A   | 3.4                  | N                        | 1          | 1       | 1        | 3.4            | 3.4             | 5                 |
| 16   | Drift of output power                           | B   | 3.0                  | R                        | $\sqrt{3}$ | 1       | 1        | 1.7            | 1.7             | ∞                 |
| <b>Phantom and set-up</b>                          |   |   |                      |                          |            |         |          |                |                 |                   |
| 17   | Phantom uncertainty                             | B   | 4.0                  | R                        | $\sqrt{3}$ | 1       | 1        | 2.3            | 2.3             | ∞                 |
| 18   | Liquid conductivity (target)                    | B   | 5.0                  | R                        | $\sqrt{3}$ | 0.64    | 0.43     | 1.8            | 1.2             | ∞                 |
| 19   | Liquid conductivity (meas.)                     | A   | 2.06                 | N                        | 1          | 0.64    | 0.43     | 1.32           | 0.89            | 43                |
| 20   | Liquid permittivity (target)                    | B   | 5.0                  | R                        | $\sqrt{3}$ | 0.6     | 0.49     | 1.7            | 1.4             | ∞                 |
| 21   | Liquid permittivity (meas.)                     | A   | 1.6                  | N                        | 1          | 0.6     | 0.49     | 1.0            | 0.8             | 521               |
| continue   |   |   |                      |                          |            |         |          |                |                 |                   |
| Combined standard uncertainty                      |   | $u'_c = \sqrt{\sum_{i=1}^{21} c_i^2 u_i^2}$ |                      |                          |            |         |          | 9.20           | 9.07            | 257               |
| Expanded uncertainty (confidence interval of 95 %) |   | $u_e = 2u_c$                                |                      |                          |            |         |          | 18.40          | 18.14           | \                 |

**Table 12.1. Uncertainty Budget for frequency range 300 MHz to 3 GHz**

### 13 MAIN TEST INSTRUMENTS

| Item | Equipment                                 | Manufacturer  | Model No.        | Serial No.                | Last Cal. | Cal. Interval |
|------|---|---------------|------------------|---------------------------|-----------|---------------|
| 1    | Signal Generator                          | Agilent       | N5181A           | MY50145187                | 2016-5-28 | 1year         |
| 2    | RF Power Meter.<br>Dual Channel           | BOONTON       | 4232A            | 10539                     | 2016-5-28 | 1year         |
| 3    | Power Sensor                              | BOONTON       | 51011EMC         | 34236/34238               | 2016-5-28 | 1year         |
| 4    | Wideband Radio<br>Communication<br>Tester | R&S           | CMW500           | 1201.0002K50-140<br>822zk | 2016-5-28 | 1year         |
| 5    | Signal Analyzer                           | Agilent       | N9010A           | My53470879                | 2016-5-28 | 1year         |
| 6    | Network<br>Analyzer                       | Agilent       | E5071C           | MY46316645                | 2016-5-28 | 1year         |
| 7    | E-Field Probe                             | SPEAG         | EX3DV4           | 3970                      | 2016-9-07 | 1year         |
| 8    | DAE                                       | SPEAG         | DAE4             | 1418                      | 2016-9-05 | 1year         |
| 9    | Validation Kit<br>2450MHz                 | SPEAG         | D2450V2          | 927                       | 2014-1-13 | 3years        |
| 10   | Dual Directional<br>Coupler               | Agilent       | EE393            | TW5451008                 | 2014-1-13 | 1year         |
| 11   | 10dB Attenuator                           | Mini-Circuits | 15542            | 3 1344                    | 2016-5-28 | 1year         |
| 12   | 10dB Attenuator                           | Mini-Circuits | 15542            | 3 1415                    | 2016-5-28 | 1year         |
| 13   | 30dB Attenuator                           | Mini-Circuits | 15542            | 3 1420                    | 2016-5-28 | 1year         |
| 14   | Power Amplifier                           | MILMEGA       | 80RF1000-<br>175 | 1059345                   | 2016-5-28 | 1 Year        |
| 15   | Power Amplifier                           | MILMEGA       | AS0102-55        | 1018770                   | 2016-5-28 | 1 Year        |
| 16   | Power Amplifier                           | MILMEGA       | AS1860-50        | 1059346                   | 2016-5-28 | 1 Year        |
| 17   | Power Meter                               | Agilent       | N1918A           | MY54180006                | 2016-5-28 | 1 Year        |
| 18   | ELI V5.0                                  | SPEAG         | QD 0VA<br>022 AA | 1231                      | 2016-5-28 | N/A           |
| 19   | Device Holder                             | SPEAG         | N/A              | N/A                       | N/A       | N/A           |

\*\*\*END OF REPORT BODY\*\*\*