

Report No.: FA882005



FCC SAR TEST REPORT

FCC ID : 2AD83POD-3-1

Equipment : Pod 3 GPS Tracker

Brand Name : Pod Trackers

Model Name : POD-003

Marketing Name : Pod 3 GPS Tracker

Applicant : Pod Trackers Pty Ltd

Lvl 9,61 Lavender St Milsons Point NSW 2061 Australia

Manufacturer : Kaifa Technology Co., Ltd.

7006 Caitian Rd., Futian Distric, Shenzhen, China

Standard : FCC 47 CFR Part 2 (2.1093)

ANSI/IEEE C95.1-1992

IEEE 1528-2013

The product was received on Oct. 07, 2018 and testing was started from Oct. 09, 2018 and completed on Oct. 13, 2018. We, SPORTON INTERNATIONAL INC., would like to declare that the tested sample has been evaluated in accordance with the test procedures and has been in compliance with the applicable technical standards.

The report must not be used by the client to claim product certification, approval, or endorsement by TAF or any agency of government.

The test results in this variant report apply exclusively to the tested model / sample. Without written approval of SPORTON INTERTIONAL INC. EMC & Wireless Communications Laboratory, the test report shall not be reproduced except in full.

Approved by: Cona Huang / Deputy Manager

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History of this test report

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Report No.	Version	Description	Issued Date
FA882005	01	Initial issue of report	Nov. 19, 2018

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1. Statement of Compliance

The maximum results of Specific Absorption Rate (SAR) found during testing for **Pod Trackers Pty Ltd, Pod 3 GPS Tracker, POD-003**, are as follows.

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Equipment Class	Frequency Band	Highest SAR Summary Body (Separation 10mm) 1g SAR (W/kg)	Highest Simultaneous Transmission 1g SAR (W/kg)
Licensed	GSM850	0.42	4.24
	GSM1900	1.10	
	WCDMA II	0.73	1.34
	WCDMA V	0.11	
Date of Testing:		2018/10/09 -	- 2018/10/13

Sporton Lab is accredited to ISO 17025 by Taiwan Accreditation Foundation (TAF code: 1190) and the FCC designation No. TW1190 under the FCC 2.948(e) by Mutual Recognition Agreement (MRA) in FCC test. 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, and had been tested in accordance with the measurement methods and procedures specified in IEEE 1528-2013 and FCC KDB publications

Reviewed by: <u>Jason Wang</u> Report Producer: <u>Daisy Peng</u>

2. Guidance Applied

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

- FCC 47 CFR Part 2 (2.1093)
- ANSI/IEEE C95.1-1992
- · IEEE 1528-2013
- FCC KDB 865664 D01 SAR Measurement 100 MHz to 6 GHz v01r04
- FCC KDB 865664 D02 SAR Reporting v01r02
- FCC KDB 447498 D01 General RF Exposure Guidance v06
- FCC KDB 248227 D01 802.11 Wi-Fi SAR v02r02
- FCC KDB 941225 D01 3G SAR Procedures v03r01

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3. Equipment Under Test (EUT) Information

3.1 General Information

Product Feature & Specification				
Equipment Name	Pod 3 GPS Tracker			
Brand Name	Pod Trackers			
Model Name	POD-003			
Marketing Name	Pod 3 GPS Tracker			
FCC ID	2AD83POD-3-1			
IMEI Code	357520072502848			
Wireless Technology and Frequency Range	GSM850: 824.2 MHz ~ 848.8 MHz GSM1900: 1850.2 MHz ~ 1909.8 MHz WCDMA Band II: 1852.4 MHz ~ 1907.6 MHz WCDMA Band V: 826.4 MHz ~ 846.6 MHz WLAN 2.4GHz Band: 2412 MHz ~ 2462 MHz Bluetooth: 2402 MHz ~ 2480 MHz			
Mode	GPRS/EGPRS RMC 12.2Kbps HSDPA HSUPA WLAN 2.4GHz: 802.11b/g/n HT20 Bluetooth LE			
HW Version	V3.1.0.0			
SW Version	V3.3.83			
EUT Stage	Production Unit			

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4. RF Exposure Limits

4.1 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.

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4.2 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

1. 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.

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5. Specific Absorption Rate (SAR)

5.1 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.

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5.2 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 (p). 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)

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

Where: σ is the conductivity of the tissue, ρ is the mass density of the tissue and E is the RMS electrical field strength.

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6. System Description and Setup

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



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- A standard high precision 6-axis robot with controller, teach pendant and software. An arm extension for accommodating the data acquisition electronics (DAE).
- An isotropic Field probe optimized and calibrated for the targeted measurement.
- A data acquisition electronics (DAE) which performs the signal amplification, signal multiplexing, AD-conversion, offset measurements, mechanical surface detection, collision detection, etc. The unit is battery powered with standard or rechargeable batteries. The signal is optically transmitted to the EOC.
- The Electro-optical converter (EOC) performs the conversion from optical to electrical signals for the digital communication to the DAE. To use optical surface detection, a special version of the EOC is required. The EOC signal is transmitted to the measurement server.
- The function of the measurement server is to perform the time critical tasks such as signal filtering, control of the robot operation and fast movement interrupts.
- The Light Beam used is for probe alignment. This improves the (absolute) accuracy of the probe positioning.
- A computer running WinXP or Win7 and the DASY5 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.

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6.1 E-Field Probe

The SAR measurement is conducted with the dosimetric probe (manufactured by SPEAG). The probe is specially designed and calibrated for use in liquid with high permittivity. The dosimetric probe has special calibration in liquid at different frequency. This probe has a built in optical surface detection system to prevent from collision with phantom.

<ES3DV3 Probe>

Construction	Symmetric design with triangular core Interleaved sensors Built-in shielding against static charges PEEK enclosure material (resistant to organic solvents, e.g., DGBE)	
Frequency	10 MHz – 4 GHz; Linearity: ±0.2 dB (30 MHz – 4 GHz)	
Directivity	±0.2 dB in TSL (rotation around probe axis) ±0.3 dB in TSL (rotation normal to probe axis)	
Dynamic Range	5 μW/g – >100 mW/g; Linearity: ±0.2 dB	
Dimensions	Overall length: 337 mm (tip: 20 mm) Tip diameter: 3.9 mm (body: 12 mm) Distance from probe tip to dipole centers: 3.0 mm	



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<EX3DV4 Probe>

Construction	Symmetric design with triangular core		
	Built-in shielding against static charges		
	PEEK enclosure material (resistant to organic		
	solvents, e.g., DGBE)		
Frequency	10 MHz – >6 GHz		
	Linearity: ±0.2 dB (30 MHz – 6 GHz)		
Directivity	±0.3 dB in TSL (rotation around probe axis)		
	±0.5 dB in TSL (rotation normal to probe axis)		
Dynamic Range	10 μW/g – >100 mW/g		
	Linearity: ±0.2 dB (noise: typically <1 µW/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		



6.2 Data Acquisition Electronics (DAE)

The data acquisition electronics (DAE) consists 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 and 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 input impedance of the DAE is 200 MOhm; the inputs are symmetrical and floating. Common mode rejection is above 80 dB.



Fig 5.1 Photo of DAE

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6.3 Phantom

<SAM Twin Phantom>

Shell Thickness	2 ± 0.2 mm; Center ear point: 6 ± 0.2 mm	
Filling Volume	Approx. 25 liters	
Dimensions	Length: 1000 mm; Width: 500 mm; Height: adjustable feet	7 5
Measurement Areas	Left Hand, Right Hand, Flat Phantom	

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The bottom plate contains three pair of bolts for locking the device holder. The device holder positions are adjusted to the standard measurement positions in the three sections. A white cover is provided to tap the phantom during off-periods to prevent water evaporation and changes in the liquid parameters. On the phantom top, three reference markers are provided to identify the phantom position with respect to the robot.

<ELI Phantom>

VEET I Halltonia		
Shell Thickness	2 ± 0.2 mm (sagging: <1%)	
Filling Volume	Approx. 30 liters	
Dimensions	Major ellipse axis: 600 mm Minor axis: 400 mm	

The ELI phantom is intended for compliance testing of handheld and body-mounted wireless devices in the frequency range of 30 MHz to 6 GHz. ELI4 is fully compatible with standard and all known tissue simulating liquids.

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6.4 Device Holder

<Mounting Device for Hand-Held Transmitter>

In combination with the Twin SAM V5.0/V5.0c or ELI phantoms, the Mounting Device for Hand-Held Transmitters enables rotation of the mounted transmitter device to specified spherical coordinates. At the heads, the rotation axis is at the ear opening. Transmitter devices can be easily and accurately positioned according to IEC 62209-1, IEEE 1528, FCC, or other specifications. The device holder can be locked for positioning at different phantom sections (left head, right head, flat). And upgrade kit to Mounting Device to enable easy mounting of wider devices like big smart-phones, e-books, small tablets, etc. It holds devices with width up to 140 mm.





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Mounting Device for Hand-Held Transmitters

Mounting Device Adaptor for Wide-Phones

<Mounting Device for Laptops and other Body-Worn Transmitters>

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 positioned. The extension is fully compatible with the SAM Twin and ELI phantoms.



Mounting Device for Laptops

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7. Measurement Procedures

The measurement procedures are as follows:

<Conducted power measurement>

(a) For WWAN power measurement, use base station simulator to configure EUT WWAN transmission in conducted connection with RF cable, at maximum power in each supported wireless interface and frequency band.

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- (b) Read the WWAN RF power level from the base station simulator.
- (c) For WLAN/BT power measurement, use engineering software to configure EUT WLAN/BT continuously transmission, at maximum RF power in each supported wireless interface and frequency band
- (d) Connect EUT RF port through RF cable to the power meter, and measure WLAN/BT output power

<SAR measurement>

- (a) Use base station simulator to configure EUT WWAN transmission in radiated connection, and engineering software to configure EUT WLAN/BT continuously transmission, at maximum RF power, in the highest power channel.
- (b) Place the EUT in the positions as Appendix D demonstrates.
- (c) Set scan area, grid size and other setting on the DASY software.
- (d) Measure SAR results for the highest power channel on each testing position.
- (e) Find out the largest SAR result on these testing positions of each band
- (f) Measure SAR results for other channels in worst SAR testing position if the reported SAR of highest power channel is larger than 0.8 W/kg

According to the test standard, the recommended procedure for assessing the peak spatial-average SAR value consists of the following steps:

- (a) Power reference measurement
- (b) Area scan
- (c) Zoom scan
- (d) Power drift measurement

7.1 Spatial Peak SAR Evaluation

The procedure for spatial peak SAR evaluation has been implemented according to the test standard. It can be conducted for 1g and 10g, as well as for user-specific masses. The DASY software includes all numerical procedures necessary to evaluate the spatial peak SAR value.

The base for the evaluation is a "cube" measurement. The measured volume must include the 1g and 10g cubes with the highest averaged SAR values. For that purpose, the center of the measured volume is aligned to the interpolated peak SAR value of a previously performed area scan.

The entire evaluation of the spatial peak values is performed within the post-processing engine (SEMCAD). The system always gives the maximum values for the 1g and 10g cubes. The algorithm to find the cube with highest averaged SAR is divided into the following stages:

- (a) Extraction of the measured data (grid and values) from the Zoom Scan
- (b) Calculation of the SAR value at every measurement point based on all stored data (A/D values and measurement parameters)
- (c) Generation of a high-resolution mesh within the measured volume
- (d) Interpolation of all measured values form the measurement grid to the high-resolution grid
- (e) Extrapolation of the entire 3-D field distribution to the phantom surface over the distance from sensor to surface
- (f) Calculation of the averaged SAR within masses of 1g and 10g

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7.2 Power Reference Measurement

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

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7.3 Area Scan

The area scan is used as a fast scan in two dimensions to find the area of high field values, before doing a fine measurement around the hot spot. The sophisticated interpolation routines implemented in DASY software can find the maximum found in the scanned area, within a range of the global maximum. The range (in dB0 is specified in the standards for compliance testing. For example, a 2 dB range is required in IEEE standard 1528 and IEC 62209 standards, whereby 3 dB is a requirement when compliance is assessed in accordance with the ARIB standard (Japan), if only one zoom scan follows the area scan, then only the absolute maximum will be taken as reference. For cases where multiple maximums are detected, the number of zoom scans has to be increased accordingly.

Area scan parameters extracted from FCC KDB 865664 D01v01r04 SAR measurement 100 MHz to 6 GHz.

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

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7.4 Zoom Scan

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

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Zoom scan parameters extracted from FCC KDB 865664 D01v01r04 SAR measurement 100 MHz to 6 GHz.

		≤ 3 GHz	> 3 GHz	
Maximum zoom scan spatial resolution: Δx_{Zoom} , Δy_{Zoom}		\leq 2 GHz: \leq 8 mm 2 – 3 GHz: \leq 5 mm [*]	$3 - 4 \text{ GHz: } \le 5 \text{ mm}^*$ $4 - 6 \text{ GHz: } \le 4 \text{ mm}^*$	
	uniform	grid: $\Delta z_{Zoom}(n)$	≤ 5 mm	$3 - 4 \text{ GHz: } \le 4 \text{ mm}$ $4 - 5 \text{ GHz: } \le 3 \text{ mm}$ $5 - 6 \text{ GHz: } \le 2 \text{ mm}$
Maximum zoom scan spatial resolution, normal to phantom surface	graded	Δz _{Zoom} (1): between 1 st two points closest to phantom surface	≤ 4 mm	3 – 4 GHz: ≤ 3 mm 4 – 5 GHz: ≤ 2.5 mm 5 – 6 GHz: ≤ 2 mm
	grid $\Delta z_{Zoom}(n>1)$: between subsequent points		≤ 1.5·∆z	Zoom(n-1)
Minimum zoom scan volume	X V 7		≥ 30 mm	3 – 4 GHz: ≥ 28 mm 4 – 5 GHz: ≥ 25 mm 5 – 6 GHz: ≥ 22 mm

Note: δ is the penetration depth of a plane-wave at normal incidence to the tissue medium; see draft standard IEEE P1528-2011 for details.

7.5 Volume Scan Procedures

The volume scan is used for assess overlapping SAR distributions for antennas transmitting in different frequency bands. It is equivalent to an oversized zoom scan used in standalone measurements. The measurement volume will be used to enclose all the simultaneous transmitting antennas. For antennas transmitting simultaneously in different frequency bands, the volume scan is measured separately in each frequency band. In order to sum correctly to compute the 1g aggregate SAR, the EUT remain in the same test position for all measurements and all volume scan use the same spatial resolution and grid spacing. When all volume scan were completed, the software, SEMCAD postprocessor can combine and subsequently superpose these measurement data to calculating the multiband SAR.

7.6 Power Drift Monitoring

All SAR testing is under the EUT install full charged battery and transmit maximum output power. In DASY measurement software, the power reference measurement and power drift measurement procedures are used for monitoring the power drift of EUT during SAR test. Both these procedures measure the field at a specified reference position before and after the SAR testing. The software will calculate the field difference in dB. If the power drifts more than 5%, the SAR will be retested.

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When zoom scan is required and the <u>reported</u> SAR from the area scan based 1-g SAR estimation procedures of KDB 447498 is $\leq 1.4 \text{ W/kg}$, $\leq 8 \text{ mm}$, $\leq 7 \text{ mm}$ and $\leq 5 \text{ mm}$ zoom scan resolution may be applied, respectively, for 2 GHz to 3 GHz, 3 GHz to 4 GHz and 4 GHz to 6 GHz.

8. Test Equipment List

Manufacture	Name of Emilion and	T /841 - 1	On what November	Calib	ration
Manufacturer	Name of Equipment	Type/Model	Serial Number	Last Cal.	Due Date
SPEAG	835MHz System Validation Kit	D835V2	4d162	Dec. 05, 2017	Dec. 04, 2018
SPEAG	1900MHz System Validation Kit	stem Validation Kit D1900V2 5d182		Dec. 06, 2017	Dec. 05, 2018
SPEAG	Dosimetric E-Field Probe	EX3DV4	3958	Jan. 11, 2018	Jan. 10, 2019
SPEAG	Data Acquisition Electronics	DAE4	1386	Aug. 29, 2018	Aug. 28, 2019
RCPTWN	Thermometer	HTC-1	TM685-1	Mar. 16, 2018	Mar. 15, 2019
Anritsu	Radio Communication Analyzer	MT8821C	6201341950	Apr. 17, 2018	Apr. 16, 2019
Agilent	Wireless Communication Test Set	E5515C	MY50266977	May. 21, 2018	May. 20, 2019
SPEAG	Device Holder	N/A	N/A	N/A	N/A
Anritsu	Signal Generator	MG3710A	6201502524	Dec. 07, 2017	Dec. 06, 2018
Agilent	ENA Network Analyzer	E5071C	MY46316648	Jan. 17, 2018	Jan. 16, 2019
SPEAG	Dielectric Probe Kit	DAK-3.5	1126	Sep. 19, 2018	Sep. 18, 2019
LINE SEIKI	Digital Thermometer	DTM3000-spezial	3169	Sep. 11, 2018	Sep. 10, 2019
Anritsu	Power Meter	ML2495A	1419002	May. 18, 2018	May. 17, 2019
Anritsu	Power Sensor	MA2411B	1339124	May. 18, 2018	May. 17, 2019
Anritsu	Power Meter	ML2495A	1240001	Sep. 13, 2018	Sep. 12, 2019
Anritsu	Power Sensor	MA2411B	1207349	Sep. 13, 2018	Sep. 12, 2019
Agilent	Spectrum Analyzer	E4408B	MY44211028	Aug. 28, 2018	Aug. 27, 2019
Anritsu	Spectrum Analyzer	MS2830A	6201396378	Jun. 23, 2018	Jun. 22, 2019
Mini-Circuits	Power Amplifier	ZVE-8G+	070501814	Oct. 08, 2018	Oct. 07, 2019
Mini-Circuits	Power Amplifier	ZVE-8G+	6382	Aug. 09, 2018	Aug. 08, 2019
ATM	ATM Dual Directional Coupler		P610410z-02	No	te 1
Woken	Attenuator 1	WK0602-XX	N/A	No	te 1
PE	Attenuator 2	PE7005-10	N/A	Note 1	
PE	Attenuator 3	Attenuator 3 PE7005- 3 N/A Note 1		te 1	

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General Note:

Prior to system verification and validation, the path loss from the signal generator to the system check source and
the power meter, which includes the amplifier, cable, attenuator and directional coupler, was measured by the
network analyzer. The reading of the power meter was offset by the path loss difference between the path to the
power meter and the path to the system check source to monitor the actual power level fed to the system check
source.

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9. System Verification

9.1 Tissue Simulating Liquids

For the measurement of the field distribution inside the SAM phantom with DASY, the phantom must be filled with around 25 liters of homogeneous body tissue simulating liquid. For head SAR testing, the liquid height from the ear reference point (ERP) of the phantom to the liquid top surface is larger than 15 cm, which is shown in Fig. 10.1. For body SAR testing, the liquid height from the center of the flat phantom to the liquid top surface is larger than 15 cm, which is shown in Fig. 10.2.







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Fig 10.2 Photo of Liquid Height for Body SAR

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9.2 Tissue Verification

The following tissue formulations are provided for reference only as some of the parameters have not been thoroughly verified. The composition of ingredients may be modified accordingly to achieve the desired target tissue parameters required for routine SAR evaluation.

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Frequency (MHz)	Water (%)	Sugar (%)	Cellulose (%)	Salt (%)	Preventol (%)	DGBE (%)	Conductivity (σ)	Permittivity (εr)		
	For Head									
750	41.1	57.0	0.2	1.4	0.2	0	0.89	41.9		
835	40.3	57.9	0.2	1.4	0.2	0	0.90	41.5		
900	40.3	57.9	0.2	1.4	0.2	0	0.97	41.5		
1800, 1900, 2000	55.2	0	0	0.3	0	44.5	1.40	40.0		
2450	55.0	0	0	0	0	45.0	1.80	39.2		
2600	54.8	0	0	0.1	0	45.1	1.96	39.0		
				For Body						
750	51.7	47.2	0	0.9	0.1	0	0.96	55.5		
835	50.8	48.2	0	0.9	0.1	0	0.97	55.2		
900	50.8	48.2	0	0.9	0.1	0	1.05	55.0		
1800, 1900, 2000	70.2	0	0	0.4	0	29.4	1.52	53.3		
2450	68.6	0	0	0	0	31.4	1.95	52.7		
2600	68.1	0	0	0.1	0	31.8	2.16	52.5		

Simulating Liquid for 5GHz, Manufactured by SPEAG

Ingredients	(% by weight)
Water	64~78%
Mineral oil	11~18%
Emulsifiers	9~15%
Additives and Salt	2~3%

<Tissue Dielectric Parameter Check Results>

Frequency (MHz)	Tissue Type	Liquid Temp. (°C)	Conductivity (σ)	Permittivity (ε _r)		Permittivity Target (ε _r)	Delta (σ) (%)	Delta (ε _r) (%)	Limit (%)	Date
835	MSL	22.7	0.998	54.379	0.97	55.20	2.89	-1.49	±5	2018/10/13
1900	MSL	22.6	1.533	54.611	1.52	53.30	0.86	2.46	±5	2018/10/9

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9.3 System Performance Check Results

Comparing to the original SAR value provided by SPEAG, the verification data should be within its specification of 10 %. Below table shows the target SAR and measured SAR after normalized to 1W input power. The table below indicates the system performance check can meet the variation criterion and the plots can be referred to Appendix A of this report.

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 (%)
2018/10/13	835	MSL	250	D835V2-4d162	EX3DV4 - SN3958	DAE4 Sn1386	2.52	9.56	10.08	5.44
2018/10/9	1900	MSL	250	D1900V2-5d182	EX3DV4 - SN3958	DAE4 Sn1386	9.68	40.40	38.72	-4.16

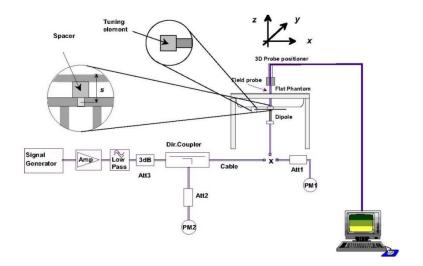




Fig 8.3.1 System Performance Check Setup

Fig 8.3.2 Setup Photo

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10. Conducted RF Output Power (Unit: dBm)

<GSM Conducted Power>

General Note:

1. Per KDB 447498 D01v06, the maximum output power channel is used for SAR testing and for further SAR test reduction.

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- 2. Per KDB 941225 D01v03r01, for SAR test reduction for GPRS / EDGE modes is determined by the source-based time-averaged output power including tune-up tolerance. The mode with highest specified time-averaged output power should be tested for SAR compliance in the applicable exposure conditions. For modes with the same specified maximum output power and tolerance, the higher number time-slot configuration should be tested. Therefore, the GPRS (4Tx slots) for GSM850/GSM1900 is considered as the primary mode.
- 3. Other configurations of GPRS / EDGE are considered as secondary modes. The 3G SAR test reduction procedure is applied, when the maximum output power and tune-up tolerance specified for production units in a secondary mode is ≤ 1/4 dB higher than the primary mode, SAR measurement is not required for the secondary mode

GSM850	Burst A	verage Powe	er (dBm)	Tune-up	Frame-A	verage Pow	er (dBm)	Tune-up
TX Channel	128	189	251	Limit	128	189	251	Limit
Frequency (MHz)	824.2	836.4	848.8	(dBm)	824.2	836.4	848.8	(dBm)
GPRS 1 Tx slot	32.02	32.10	32.21	32.50	23.02	23.10	23.21	23.50
GPRS 2 Tx slots	32.02	32.09	32.19	32.50	26.02	26.09	26.19	26.50
GPRS 3 Tx slots	31.22	31.28	31.36	31.50	26.96	27.02	27.10	27.24
GPRS 4 Tx slots	30.06	30.15	30.24	30.50	27.06	27.15	27.24	27.50
EDGE 1 Tx slot	26.17	26.34	26.45	27.00	17.17	17.34	17.45	18.00
EDGE 2 Tx slots	26.22	26.31	26.42	27.00	20.22	20.31	20.42	21.00
EDGE 3 Tx slots	25.47	25.64	25.55	26.00	21.21	21.38	21.29	21.74
EDGE 4 Tx slots	24.28	24.49	24.46	25.00	21.28	21.49	21.46	22.00

GSM1900	Burst A	verage Powe	er (dBm)	Tune-up	Frame-A	verage Pow	er (dBm)	Tune-up
TX Channel	512	661	810	Limit	512	661	810	Limit
Frequency (MHz)	1850.2	1880	1909.8	(dBm)	1850.2	1880	1909.8	(dBm)
GPRS 1 Tx slot	27.79	27.95	27.85	28.00	18.79	18.95	18.85	19.00
GPRS 2 Tx slots	27.65	27.92	27.75	28.00	21.65	21.92	21.75	22.00
GPRS 3 Tx slots	27.17	27.24	27.14	27.50	22.91	22.98	22.88	23.24
GPRS 4 Tx slots	26.27	26.25	26.32	27.00	23.27	23.25	23.32	24.00
EDGE 1 Tx slot	24.05	24.38	24.06	25.00	15.05	15.38	15.06	16.00
EDGE 2 Tx slots	24.02	24.32	24.01	25.00	18.02	18.32	18.01	19.00
EDGE 3 Tx slots	23.13	23.47	23.38	24.00	18.87	19.21	19.12	19.74
EDGE 4 Tx slots	22.13	22.32	22.14	23.00	19.13	19.32	19.14	20.00

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<WCDMA Conducted Power>

- 1. The following tests were conducted according to the test requirements outlines in 3GPP TS 34.121 specification.
- 2. The procedures in KDB 941225 D01v03r01 are applied for 3GPP Rel. 6 HSPA to configure the device in the required sub-test mode(s) to determine SAR test exclusion.

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A summary of these settings are illustrated below:

HSDPA Setup Configuration:

- The EUT was connected to Base Station Agilent E5515C referred to the Setup Configuration.
- b. The RF path losses were compensated into the measurements.
- A call was established between EUT and Base Station with following setting:
 - i. Set Gain Factors (β_c and β_d) and parameters were set according to each
 - ii. Specific sub-test in the following table, C10.1.4, quoted from the TS 34.121
 - iii. Set RMC 12.2Kbps + HSDPA mode.
 - iv. Set Cell Power = -86 dBm
 - v. Set HS-DSCH Configuration Type to FRC (H-set 1, QPSK)
 - vi. Select HSDPA Uplink Parameters
 - vii. Set Delta ACK, Delta NACK and Delta CQI = 8
 - viii. Set Ack-Nack Repetition Factor to 3
 - ix. Set CQI Feedback Cycle (k) to 4 ms
 - x. Set CQI Repetition Factor to 2
 - xi. Power Ctrl Mode = All Up bits
- d. The transmitted maximum output power was recorded.

Table C.10.1.4: β values for transmitter characteristics tests with HS-DPCCH

Sub-test	βο	βd	βd (SF)	βс/βа	βнs (Note1, Note 2)	CM (dB) (Note 3)	MPR (dB) (Note 3)
1	2/15	15/15	64	2/15	4/15	0.0	0.0
2	12/15 (Note 4)	15/15 (Note 4)	64	12/15 (Note 4)	24/15	1.0	0.0
3	15/15	8/15	64	15/8	30/15	1.5	0.5
4	15/15	4/15	64	15/4	30/15	1.5	0.5

- Note 1: \triangle_{ACK} , \triangle_{NACK} and $\triangle_{CQI} = 30/15$ with $\beta_{hs} = 30/15 * \beta_c$.
- Note 2: For the HS-DPCCH power mask requirement test in clause 5.2C, 5.7A, and the Error Vector Magnitude (EVM) with HS-DPCCH test in clause 5.13.1A, and HSDPA EVM with phase discontinuity in clause 5.13.1AA, \triangle ACK and \triangle NACK = 30/15 with β_{hs} = 30/15 * β_c , and \triangle CQI = 24/15 with β_{hs} = 24/15 * β_c .
- Note 3: CM = 1 for $\beta_{\text{e}}/\beta_{\text{d}}$ =12/15, $\beta_{\text{hs}}/\beta_{\text{e}}$ =24/15. For all other combinations of DPDCH, DPCCH and HSDPCH the MPR is based on the relative CM difference. This is applicable for only UEs that support HSDPA in release 6 and later releases.
- Note 4: For subtest 2 the β_c/β_d ratio of 12/15 for the TFC during the measurement period (TF1, TF0) is achieved by setting the signalled gain factors for the reference TFC (TF1, TF1) to β_c = 11/15 and β_d = 15/15.

Setup Configuration

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HSUPA Setup Configuration: a. The EUT was connected to Base Station Agilent E5515C referred to the Setup Configuration.

- b. The RF path losses were compensated into the measurements.
- c. A call was established between EUT and Base Station with following setting *:
 - i. Call Configs = 5.2B, 5.9B, 5.10B, and 5.13.2B with QPSK
 - ii. Set the Gain Factors (β_c and β_d) and parameters (AG Index) were set according to each specific sub-test in the following table, C11.1.3, quoted from the TS 34.121

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- iii. Set Cell Power = -86 dBm
- iv. Set Channel Type = 12.2k + HSPA
- v. Set UE Target Power
- vi. Power Ctrl Mode= Alternating bits
- vii. Set and observe the E-TFCI
- viii. Confirm that E-TFCI is equal to the target E-TFCI of 75 for sub-test 1, and other subtest's E-TFCI
- d. The transmitted maximum output power was recorded.

Table C.11.1.3: β values for transmitter characteristics tests with HS-DPCCH and E-DCH

Sub- test	βα	βd	βd (SF)	βс/βа	Внs (Note1)	Вес	β _{ed} (Note 4) (Note 5)	β _{ed} (SF)	β _{ed} (Codes)	CM (dB) (Note 2)	MPR (dB) (Note 2) (Note 6)	AG Index (Note 5)	E- TFCI
1	11/15 (Note 3)	15/15 (Note 3)	64	11/15 (Note 3)	22/15	209/2 25	1309/225	4	1	1.0	0.0	20	75
2	6/15	15/15	64	6/15	12/15	12/15	94/75	4	1	3.0	2.0	12	67
3	15/15	9/15	64	15/9	30/15	30/15	β _{ed} 1: 47/15 β _{ed} 2: 47/15	4	2	2.0	1.0	15	92
4	2/15	15/15	64	2/15	4/15	2/15	56/75	4	1	3.0	2.0	17	71
5	15/15	0	-	-	5/15	5/15	47/15	4	1	1.0	0.0	12	67

- Note 1: For sub-test 1 to 4, Δ_{NACK} , Δ_{NACK} and Δ_{CQI} = 30/15 with β_{hs} = 30/15 * β_c . For sub-test 5, Δ_{ACK} , Δ_{NACK} and Δ_{CQI} = 5/15 with β_{hs} = 5/15 * β_c .
- Note 2: CM = 1 for β_c/β_d =12/15, β_{he}/β_c =24/15. For all other combinations of DPDCH, DPCCH, HS- DPCCH, E-DPDCH and E-DPCCH the MPR is based on the relative CM difference.
- Note 3: For subtest 1 the β_d/β_d ratio of 11/15 for the TFC during the measurement period (TF1, TF0) is achieved by setting the signalled gain factors for the reference TFC (TF1, TF1) to β_c = 10/15 and β_d = 15/15.
- Note 4: In case of testing by UE using E-DPDCH Physical Layer category 1, Sub-test 3 is omitted according to TS25.306 Table 5.1g.
- Note 5: βed can not be set directly; it is set by Absolute Grant Value.
- Note 6: For subtests 2, 3 and 4, UE may perform E-DPDCH power scaling at max power which could results in slightly smaller MPR values.

Setup Configuration

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< WCDMA Conducted Power>

General Note:

1. Per KDB 941225 D01v03r01, for SAR testing is measured using a 12.2 kbps RMC with TPC bits configured to all "1's".

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2. Per KDB 941225 D01v03r01, RMC 12.2kbps setting is used to evaluate SAR. The maximum output power and tune-up tolerance specified for production units in HSDPA / HSUPA is ≤ ¼ dB higher than RMC 12.2kbps or when the highest reported SAR of the RMC12.2kbps is scaled by the ratio of specified maximum output power and tune-up tolerance of HSDPA / HSUPA to RMC12.2kbps and the adjusted SAR is ≤ 1.2 W/kg, SAR measurement is not required for HSDPA / HSUPA, and according to the following RF output power, the output power results of the secondary modes (HSUPA, HSDPA) are less than ¼ dB higher than the primary modes; therefore, SAR measurement is not required for HSDPA / HSUPA.

	Band		WCDMA II				WCDMA V		
TX	Channel	9262	9400	9538	Tune-up Limit	4132	4182	4233	Tune-up Limit
Rx	Rx Channel		9800	9938	(dBm)	4357	4407	4458	(dBm)
Frequ	ency (MHz)	1852.4	1880	1907.6		826.4	836.4	846.6	
3GPP Rel 99	RMC 12.2Kbps	21.56	21.78	21.32	22.00	23.56	23.45	23.38	24.00
3GPP Rel 6	HSDPA Subtest-1	21.21	21.32	21.19	21.50	23.07	22.97	22.91	23.50
3GPP Rel 6	HSDPA Subtest-2	20.41	20.76	20.49	21.50	22.34	22.23	22.16	23.50
3GPP Rel 6	HSDPA Subtest-3	20.21	20.55	20.26	21.00	22.10	21.99	21.91	23.00
3GPP Rel 6	HSDPA Subtest-4	19.95	20.31	20.01	21.00	21.84	21.73	21.67	23.00
3GPP Rel 6	HSUPA Subtest-1	20.85	20.98	20.76	21.00	22.51	22.39	22.28	23.00
3GPP Rel 6	HSUPA Subtest-2	21.21	21.33	21.20	21.50	22.98	22.89	22.79	23.00
3GPP Rel 6	HSUPA Subtest-3	20.68	20.82	20.56	21.50	21.95	21.87	21.79	22.00
3GPP Rel 6	HSUPA Subtest-4	21.16	21.31	21.08	21.50	23.01	22.90	22.81	23.50
3GPP Rel 6	HSUPA Subtest-5	20.62	20.79	20.61	21.00	22.34	22.12	22.04	23.00

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11. SAR Exclusions Applied

<For 2.4GHz WLAN>

Mode	Average power (dBm)							
Mode	802.11b 1Mbps	802.11g 6Mbps	802.11n-HT20 MCS0					
2.4GHz WLAN	10.54	10.17	10.27					
Tune-up Limit	10.6	10.5	10.5					

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Note:

1. Per KDB 447498 D01v06, 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:

[(max. power of channel, including tune-up tolerance, mW)/(min. test separation distance, mm)] $\cdot [\sqrt{f(GHz)}] \le 3.0$ for 1-g SAR and ≤ 7.5 for 10-g extremity SAR

- f(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

2.4GHz WLAN Max Power (dBm)	Separation Distance (mm)	Frequency (GHz)	Exclusion thresholds
10.6	< 10	2.462	1.80

Note:

Per KDB 447498 D01v06, when the test separation distance is 10 mm to determine SAR test exclusion. The test exclusion threshold is 1.80 which is <= 3, SAR testing is not required.

<For Bluetooth>

Mode Band	Average power(dBm)
Wode Band	Bluetooth-LE
2.4GHz Bluetooth	0

Note:

2. Per KDB 447498 D01v06, 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:

[(max. power of channel, including tune-up tolerance, mW)/(min. test separation distance, mm)] $\cdot [\sqrt{f(GHz)}] \le 3.0$ for 1-g SAR and ≤ 7.5 for 10-g extremity SAR

- f(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

Bluetooth Max Power (dBm)	Separation Distance (mm)	Frequency (GHz)	Exclusion thresholds		
0	< 10	2.48	0.16		

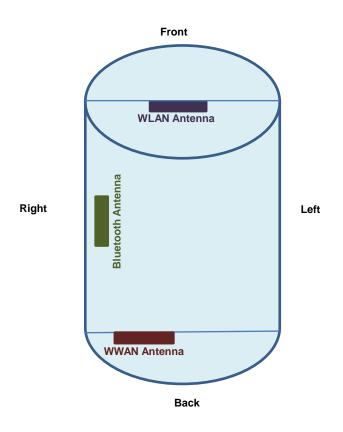
Note:

Per KDB 447498 D01v06, when the test separation distance is 10 mm to determine SAR test exclusion. The test exclusion threshold is 0.16 which is <= 3, SAR testing is not required.

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12. Antenna Location



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13. SAR Test Results

General Note:

- 1. Per KDB 447498 D01v06, the reported SAR is the measured SAR value adjusted for maximum tune-up tolerance.
 - a. 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.

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- b. For WWAN: Reported SAR(W/kg)= Measured SAR(W/kg)*Tune-up Scaling Factor
- 2. 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
- 3. Per KDB 865664 D01v01r04, for each frequency band, repeated SAR measurement is required only when the measured SAR is ≥0.8W/kg.

GSM Note:

- 1. Per KDB 941225 D01v03r01, for SAR test reduction for GPRS / EDGE modes is determined by the source-based time-averaged output power including tune-up tolerance. The mode with highest specified time-averaged output power should be tested for SAR compliance in the applicable exposure conditions. For modes with the same specified maximum output power and tolerance, the higher number time-slot configuration should be tested. Therefore, the GPRS (4Tx slots) for GSM850/GSM1900 is considered as the primary mode.
- Other configurations of GPRS / EDGE are considered as secondary modes. The 3G SAR test reduction procedure is applied, when the maximum output power and tune-up tolerance specified for production units in a secondary mode is ≤ ¼ dB higher than the primary mode, SAR measurement is not required for the secondary mode.

UMTS Note:

- 1. Per KDB 941225 D01v03r01, for SAR testing is measured using a 12.2 kbps RMC with TPC bits configured to all "1's".
- 2. Per KDB 941225 D01v03r01, RMC 12.2kbps setting is used to evaluate SAR. The maximum output power and tune-up tolerance specified for production units in HSDPA / HSUPA is ≤ ¼ dB higher than RMC 12.2Kbps or when the highest reported SAR of the RMC12.2Kbps is scaled by the ratio of specified maximum output power and tune-up tolerance of HSDPA / HSUPA to RMC12.2Kbps and the adjusted SAR is ≤ 1.2 W/kg, SAR measurement is not required for HSDPA / HSUPA, and according to the following RF output power, the output power results of the secondary modes (HSUPA, HSDPA, DC-HSDPA) are less than ¼ dB higher than the primary modes; therefore, SAR measurement is not required for HSDPA / HSUPA.

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13.1 **Body SAR**

<GSM SAR>

Plot No.	Band	Mode	Test Position	Gap (mm)	Ch.	Freq. (MHz)	Average Power (dBm)	Tune-Up Limit (dBm)	Tune-up Scaling Factor	Power Drift (dB)	Measured 1g SAR (W/kg)	Reported 1g SAR (W/kg)
	GSM850	GPRS(4 Tx slots)	Front	10mm	251	848.8	30.24	30.50	1.062	0.09	0.156	0.166
01	GSM850	GPRS(4 Tx slots)	Back	10mm	251	848.8	30.24	30.50	1.062	-0.18	0.399	0.424
	GSM850	GPRS(4 Tx slots)	Right Side	10mm	251	848.8	30.24	30.50	1.062	0.02	0.193	0.205
	GSM850	GPRS(4 Tx slots)	Left Side	10mm	251	848.8	30.24	30.50	1.062	-0.01	0.045	0.048
	GSM1900	GPRS(4 Tx slots)	Front	10mm	810	1909.8	26.32	27.00	1.169	0.08	0.862	1.008
	GSM1900	GPRS(4 Tx slots)	Front	10mm	512	1850.2	26.27	27.00	1.183	0.09	0.549	0.649
	GSM1900	GPRS(4 Tx slots)	Front	10mm	661	1880	26.25	27.00	1.189	0.08	0.675	0.802
02	GSM1900	GPRS(4 Tx slots)	Back	10mm	810	1909.8	26.32	27.00	1.169	-0.15	0.944	1.104
	GSM1900	GPRS(4 Tx slots)	Back	10mm	512	1850.2	26.27	27.00	1.183	0.03	0.643	0.761
	GSM1900	GPRS(4 Tx slots)	Back	10mm	661	1880	26.25	27.00	1.189	0.05	0.808	0.960
	GSM1900	GPRS(4 Tx slots)	Right Side	10mm	810	1909.8	26.32	27.00	1.169	-0.02	0.458	0.536
	GSM1900	GPRS(4 Tx slots)	Left Side	10mm	810	1909.8	26.32	27.00	1.169	0.04	0.104	0.122

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<WCDMA SAR>

Plot No.	Band	Mode	Test Position	Gap (mm)	Ch.	Freq. (MHz)	Average Power (dBm)	Tune-Up Limit (dBm)	Tune-up Scaling Factor	Power Drift (dB)	Measured 1g SAR (W/kg)	Reported 1g SAR (W/kg)
	WCDMA II	RMC 12.2Kbps	Front	10mm	9400	1880	21.78	22.00	1.052	0.02	0.591	0.622
03	WCDMA II	RMC 12.2Kbps	Back	10mm	9400	1880	21.78	22.00	1.052	0.03	0.698	0.734
	WCDMA II	RMC 12.2Kbps	Right Side	10mm	9400	1880	21.78	22.00	1.052	0.16	0.277	0.291
	WCDMA II	RMC 12.2Kbps	Left Side	10mm	9400	1880	21.78	22.00	1.052	-0.02	0.063	0.066
	WCDMA V	RMC 12.2Kbps	Front	10mm	4132	826.4	23.56	24.00	1.107	0.07	0.045	0.049
04	WCDMA V	RMC 12.2Kbps	Back	10mm	4132	826.4	23.56	24.00	1.107	0.02	0.102	0.113
	WCDMA V	RMC 12.2Kbps	Right Side	10mm	4132	826.4	23.56	24.00	1.107	-0.03	0.054	0.060
	WCDMA V	RMC 12.2Kbps	Left Side	10mm	4132	826.4	23.56	24.00	1.107	0.01	0.012	0.013

13.2 Repeated SAR Measurement

No.	Band	Mode	Test Position	Gap (mm)	Ch.	Freq. (MHz)	Average Power (dBm)	Tune-Up Limit (dBm)	Tune-up Scaling Factor	Power Drift (dB)	Measured 1g SAR (W/kg)	Ratio	Reported 1g SAR (W/kg)
1st	GSM1900	GPRS(4 Tx slots)	Back	10mm	810	1909.8	26.32	27.00	1.169	-0.15	0.944		1.104
2nd	GSM1900	GPRS(4 Tx slots)	Back	10mm	810	1909.8	26.32	27.00	1.169	0.07	0.926	1.02	1.083

General Note:

- 1. Per KDB 865664 D01v01r04, for each frequency band, repeated SAR measurement is required only when the measured SAR is ≥0.8W/kg.
- 2. Per KDB 865664 D01v01r04, if the ratio among the repeated measurement is ≤ 1.2 and the measured SAR <1.45W/kg, only one repeated measurement is required.
- 3. The ratio is the difference in percentage between original and repeated measured SAR.
- 4. All measurement SAR result is scaled-up to account for tune-up tolerance and is compliant.

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14. Simultaneous Transmission Analysis

NO.	Simultaneous Transmission Configurations	Body
1.	GPRS/EDGE + WLAN2.4GHz	Yes
2.	WCDMA + WLAN2.4GHz	Yes
3.	GPRS/EDGE + Bluetooth	Yes
4.	WCDMA+ Bluetooth	Yes

General Note:

- 1. All licensed modes share the same antenna part and cannot transmit simultaneously
- 2. EUT will choose either WLAN 2.4GHz or WLAN 5GHz according to the network signal condition; therefore, 2.4GHz
- 3. The Scaled SAR summation is calculated based on the same configuration and test position.
- 4. Per KDB 447498 D01v06, simultaneous transmission SAR is compliant if,
 - i) Scalar SAR summation < 1.6W/kg.
 - ii) SPLSR = (SAR1 + SAR2)^1.5 / (min. separation distance, mm), and the peak separation distance is determined from the square root of [(x1-x2)2 + (y1-y2)2 + (z1-z2)2], where (x1, y1, z1) and (x2, y2, z2) are the coordinates of the extrapolated peak SAR locations in the zoom scan.

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- iii) If SPLSR ≤ 0.04, simultaneously transmission SAR measurement is not necessary.
- iv) Simultaneously transmission SAR measurement, and the reported multi-band SAR < 1.6W/kg.
- 5. For simultaneous transmission analysis, Bluetooth SAR is estimated per KDB 447498 D01v06 based on the formula below.
 - i) (max. power of channel, including tune-up tolerance, mW)/(min. test separation distance, mm)]·[$\sqrt{f(GHz)/x}$] W/kg for test separation distances \leq 50 mm; where x = 7.5 for 1-g SAR, and x = 18.75 for 10-g SAR.
 - ii) When the minimum separation distance is < 5mm, the distance is used 5mm to determine SAR test exclusion.
 - iii) 0.4 W/kg for 1-g SAR and 1.0 W/kg for 10-g SAR, when the test separation distances is > 50 mm.

Bluetooth	Exposure Position	Body		
Max Power	Test separation	10 mm		
0 dBm	Estimated SAR (W/kg)	0.021 W/kg		

 ∟AN 2.4GHz ∕lax Power	Exposure Position	All Positions		
10.6 dBm	Estimated SAR (W/kg)	0.240 W/kg		

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14.1 Body Exposure Conditions

WWAN Band		Exposure Position	1 WWAN 1g SAR (W/kg)	2 2.4GHz WLAN Estimated 1g SAR (W/kg)	3 Bluetooth Estimated 1g SAR (W/kg)	1+2 Summed 1g SAR (W/kg)	1+3 Summed 1g SAR (W/kg)
		Front	0.166	0.240	0.021	0.41	0.19
	GSM850	Back	0.424	0.240	0.021	0.66	0.45
	GSIVIOSO	Left side	0.205	0.240	0.021	0.45	0.23
GSM		Right side	0.048	0.240	0.021	0.29	0.07
GSIVI	GSM1900	Front	1.008	0.240	0.021	1.25	1.03
		Back	1.104	0.240	0.021	1.34	1.13
		Left side	0.536	0.240	0.021	0.78	0.56
		Right side	0.122	0.240	0.021	0.36	0.14
	WCDMA II	Front	0.622	0.240	0.021	0.86	0.64
		Back	0.734	0.240	0.021	0.97	0.76
	WCDIVIA II	Left side	0.291	0.240	0.021	0.53	0.31
WCDMA		Right side	0.066	0.240	0.021	0.31	0.09
VVCDIVIA		Front	0.049	0.240	0.021	0.29	0.07
	MCDMAN	Back	0.113	0.240	0.021	0.35	0.13
	WCDMA V	Left side	0.060	0.240	0.021	0.30	80.0
		Right side	0.013	0.240	0.021	0.25	0.03

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15. Uncertainty Assessment

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

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16. References

- [1] FCC 47 CFR Part 2 "Frequency Allocations and Radio Treaty Matters; General Rules and Regulations"
- [2] ANSI/IEEE Std. C95.1-1992, "IEEE Standard for Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 kHz to 300 GHz", September 1992
- [3] 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", Sep 2013
- [4] SPEAG DASY System Handbook
- [5] FCC KDB 248227 D01 v02r02, "SAR Guidance for IEEE 802.11 (WiFi) Transmitters", Oct 2015.
- [6] FCC KDB 447498 D01 v06, "Mobile and Portable Device RF Exposure Procedures and Equipment Authorization Policies", Oct 2015
- [7] FCC KDB 941225 D01 v03r01, "3G SAR MEAUREMENT PROCEDURES", Oct 2015
- [8] FCC KDB 865664 D01 v01r04, "SAR Measurement Requirements for 100 MHz to 6 GHz", Aug 2015.
- [9] FCC KDB 865664 D02 v01r02, "RF Exposure Compliance Reporting and Documentation Considerations" Oct 2015.

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