SAR TEST REPORT

For

LugLoc LLC

Luggage Locator

Model No.: LUGLOC002

Prepared for : LugLoc LLC

Address : 550 NW 29th Street, Miami Florida United States 33127

Prepared by : Shenzhen LCS Compliance Testing Laboratory Ltd.

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Date of receipt of test sample : September 29, 2016

Number of tested samples

Serial number : Prototype

September 29, 2016 ~ September 29, 2016 Date of Test

Date of Report : November 03, 2016

SAR TEST REPORT

Report Reference No.: LCS1611030274E

Date Of Issue: November 03, 2016

Testing Laboratory Name.....: Shenzhen LCS Compliance Testing Laboratory Ltd.

Bao'an District, Shenzhen, Guangdong, China

Testing Location/ Procedure.....: Full application of Harmonised standards

Partial application of Harmonised standards □

Other standard testing method

Applicant's Name.....: LugLoc LLC

Address : 550 NW 29th Street, Miami Florida United States 33127

Test Specification:

Standard : IEEE 1528:2013/ KDB 447498/ KDB 941225

47CFR §2.1093

Test Report Form No. LCSEMC-1.0

TRF Originator: Shenzhen LCS Compliance Testing Laboratory Ltd.

Master TRF..... Dated 2014-09

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Test Item Description.....: Luggage Locator

Trade Mark: LugLoc

Model/Type Reference: LUGLOC002

Operation Frequency : GSM 850/PCS1900, Bluetooth4.0(BLE Only)

Modulation Type : GSM(GMSK), Bluetooth(GFSK)

Ratings : DC 3.7V by battery(1600mAh)

Recharge Voltage: DC 5V/600mA

Result: Positive

Compiled by:

linda He

Supervised by:

Approved by:

Linda He/ File administrators

Glin Lu/ Technique principal

Gavin Liang/ Manager

SAR -- TEST REPORT

Test Report No.: LCS1611030274E November 03, 2016

Date of issue

Type / Model. : LUGLOC002

EUT. : Luggage Locator

Applicant. : LugLoc LLC
Address. : 550 NW 29th Street, Miami Florida United States 33127

Telephone : /
Fax. : /

Manufacturer : LugLoc LLC
Address. : 550 NW 29th Street, Miami Florida United States 33127

Telephone : /
Fax. : /

Factory : LugLoc LLC
Address : 550 NW 29th Street, Miami Florida United States 33127

Telephone : /
Factory : LugLoc LLC
Address : 550 NW 29th Street, Miami Florida United States 33127

Telephone : /
Fax. : /

| Test Result | Positive |
|-------------|----------|
| Test Result | Positive |

The test report merely corresponds to the test sample.

It is not permitted to copy extracts of these test result without the written permission of the test laboratory.

| SHENZHEN I C | COMPLIANCE | TESTING IA | BORATORY LTD. |
|--------------|------------|------------|---------------|
| SHENZHEN LU | COMPLIANCE | LIESHNULLA | DUKATUKI LID. |

FCC ID: 2AJ5H-LUGLOC002

Report No.: LCS1611030274E

Revison History

| Revision | Issue Date | Revisions | Revised By |
|----------|------------|---------------|-------------|
| 00 | 2016-11-03 | Initial Issue | Gavin Liang |
| | | | |
| | | | |

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1.TEST STANDARDS AND TEST DESCRIPTION

1.1. Test Standards

IEEE Std C95.1, 2005: IEEE Standard for Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 KHz to 300 GHz. It specifies the maximum exposure limit of 1.6 W/kg as averaged over any 1 gram of tissue for portable devices being used within 20 cm of the user in the uncontrolled environment. 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.

FCC Part 2.1093 Radiofrequency Radiation Exposure Evaluation: Portable Devices

<u>KDB447498 D01 General RF Exposure Guidance v06 :</u> Mobile and Portable Device RF Exposure Procedures and Equipment Authorization Policies

KDB648474 D04, Handset SAR v01r03: SAR Evaluation Considerations for Wireless Handsets

KDB865664 D01 SAR Measurement 100 MHz to 6 GHz v01r04 : SAR Measurement Requirements for 100 MHz to 6 GHz

<u>KDB865664 D02 RF Exposure Reporting v01r02:</u> RF Exposure Compliance Reporting and Documentation Considerations

KDB941225 D01 3G SAR Procedures v03r01: 3G SAR MEAUREMENT PROCEDURES

1.2. Test Description

The EUT battery must be fully charged and checked periodically during the test to ascertain uniform power . And Test device is identical prototype.

1.3. General Remarks

| Date of receipt of test sample | : | September 29, 2016 |
|--------------------------------|---|--------------------|
| | | |
| Testing commenced on | : | September 29, 2016 |
| | | |
| Testing concluded on | : | September 29 2016 |

1.4. Product Description

The **Bluebird Inc.'s** Model: LUGLOC002 or the "EUT" as referred to in this report; more general information as follows, for more details, refer to the user's manual of the EUT.

| General Description | | |
|-----------------------|---|--|
| Product Name: | Luggage Locator | |
| Trade Mark: | LugLoc | |
| Model/Type reference: | LUGLOC002 | |
| Listed Model(s): | 1 | |
| Modulation Type: | GMSK for GSM/GPRS; GFSK for Bluetooth | |
| Device category: | Portable Device | |
| Exposure category: | General population/uncontrolled environment | |
| EUT Type: | Production Unit | |
| Hardware Version | V2.0 | |
| Software Version: | 4.0 | |
| Power supply: | DC 3.7V by battery(1600mAh) | |
| | Recharge Voltage: DC 5V/600mA | |
| Hotspot: | Not supported | |

The EUT is Luggage Locator. the Luggage Locatoris intended for speech and Multimedia Message Service (MMS) transmission. It is equipped with GPRS class 12 for GSM850, PCS1900, and Bluetooth functions. For more information see the following datasheet

| NZHEN LCS COMPLIANCE TESTI | NG LABORATORY LTD. | FCC ID: 2AJ5H-LUGLOC002 | Report No.: LCS1611030274 | | |
|----------------------------|--------------------|---------------------------------|---------------------------|--|--|
| Technical Characteristics | | | | | |
| GSM | | | | | |
| Support Networks | GSM, GPRS | | | | |
| Support Band | GSM850, PCS190 | 00 | | | |
| Frequency | GSM850: 824.2~8 | | | | |
| | GSM1900: 1850.2 | | | | |
| Power Class: | GSM850:Power C | | | | |
| | PCS1900:Power | | | | |
| Modulation Type: | GMSK for GSM/G | SPRS, 8-PSK(EGPRS) | | | |
| Antenna Type | Internal Antenna, | Internal Antenna, 1.12dBi(Max.) | | | |
| GSM Release Version | R99 | | | | |
| GPRS Multislot Class | 12 | | | | |
| EGPRS Multislot Class | Not Supported | | | | |
| DTM Mode Not Supported | | | | | |
| Bluetooth | | | | | |
| Bluetooth Version: | Supported BT 4.0 | | | | |
| Modulation: | GFSK(1Mbps) | | | | |
| Operation frequency: | 2402MHz~2480M | Hz | | | |
| Channel number: | 40 | | | | |
| Channel separation: | 2MHz | | | | |

1.5. Statement of Compliance

Antenna Description

The maximum of results of SAR found during testing for LUGLOC002 are follows:

PIFA Antenna, 0.5dBi(Max.)

<Highest Reported standalone SAR Summary>

| Classment Class | Frequency Band | Body-worn (Report 1g SAR(W/Kg) |
|--------------------|-------------------|-----------------------------------|
| PCE | GSM 850 | 1.052 |
| POE | GSM1900 | 0.514 |

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 C95.1-2005, and had been tested in accordance with the measurement methods and procedures specified in IEEE 1528-2013.

<Highest Reported simultaneous SAR Summary>

| Exposure Position | Frequency Band | Reported SAR _{1-g} (W/kg) | Classment Class | Highest Reported Simultaneous Transmission SAR _{1-g} (W/kg) |
|-------------------|-------------------|---------------------------------------|--------------------|---|
| Pady | GSM 850 | 1.052 | PCE | 1.094 |
| Body | BT | 0.042 | DTS | 1.094 |

2.TEST ENVIRONMENT

2.1. Test Facility

The test facility is recognized, certified, or accredited by the following organizations:

Site Description EMC Lab.

: CNAS Registration Number. is L4595.

FCC Registration Number. is 899208.

Industry Canada Registration Number. is 9642A-1. VCCI Registration Number. is C-4260 and R-3804.

ESMD Registration Number. is ARCB0108. UL Registration Number. is 100571-492. TUV SUD Registration Number. is SCN1081.

TUV RH Registration Number. is UA 50296516-001.

2.2. Environmental conditions

During the measurement the environmental conditions were within the listed ranges:

| Temperature: | 18-25 ° C |
|-----------------------|--------------|
| | |
| Humidity: | 40-65 % |
| _ | |
| Atmospheric pressure: | 950-1050mbar |

2.3. SAR Limits

FCC Limit (1a Tissue)

| | SAR (W/kg) | | | |
|--|--|--|--|--|
| EXPOSURE LIMITS | (General Population / Uncontrolled Exposure Environment) | (Occupational / Controlled Exposure Environment) | | |
| Spatial Average(averaged over the whole body) | 0.08 | 0.4 | | |
| Spatial Peak(averaged over any 1 g of tissue) | 1.6 | 8.0 | | |
| Spatial Peak(hands/wrists/ feet/anklesaveraged over 10 g) | 4.0 | 20.0 | | |

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

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

2.4. Equipments Used during the Test

| | | | Serial Number | Calibration | |
|--|-----------------------------|--------------------|---------------------------|---------------------|--------------------|
| Test Equipment | Manufacturer | Type/Model | | Calibration Date | Calibration Due |
| PC | Lenovo | G5005 | MY42081102 | N/A | N/A |
| Signal Generator | Angilent | E4438C | MY42081396 | 09/25/2016 | 09/24/2017 |
| Multimeter | Keithley | MiltiMeter 2000 | 4059164 | 10/01/2015 | 09/30/2016 |
| S-parameter Network Analyzer | Agilent | 8753ES | US38432944 | 09/25/2016 | 09/24/2017 |
| Wireless Communication Test Set | R&S | CMU200 | 105988 | 09/25/2016 | 09/24/2017 |
| Power Meter | R&S | NRVS | 100469 | 09/25/2016 | 09/24/2017 |
| Power Sensor | R&S | NRV-Z51 | 100458 | 09/25/2016 | 09/24/2017 |
| Power Sensor | R&S | NRV-Z32 | 10057 | 09/25/2016 | 09/24/2017 |
| E-Field PROBE | SATIMO | SSE5 | SN 17/14 EPG214 | 10/01/2015 | 09/30/2016 |
| DIPOLE 835 | SATIMO | SID 835 | SN 07/14 DIP 0G835-303 | 10/01/2015 | 09/30/2016 |
| DIPOLE 1900 | SATIMO | SID 1900 | SN 30/14 DIP 1G900-333 | 10/01/2015 | 09/30/2016 |
| COMOSAR OPEN Coaxial Probe | SATIMO | OCPG 68 | SN 40/14 OCPG68 | 10/01/2015 | 09/30/2016 |
| Communication Antenna | SATIMO | ANTA57 | SN 39/14 ANTA57 | 10/01/2015 | 09/30/2016 |
| Mobile Phone POSITIONING DEVICE | SATIMO | MSH98 | SN 40/14 MSH98 | N/A | N/A |
| DUMMY PROBE | SATIMO | DP60 | SN 03/14 DP60 | N/A | N/A |
| SAM PHANTOM | SATIMO | SAM117 | SN 40/14 SAM117 | N/A | N/A |
| 6 AXIS ROBOT | KUKA | KR6-R900 | 501217 | N/A | N/A |
| High Power Solid State Amplifier (80MHz~1000MHz) | Instruments for Industry | CMC150 | M631-0627 | 09/25/2016 | 09/24/2017 |
| Medium Power Solid State Amplifier (0.8~4.2GHz) | Instruments for Industry | S41-25 | M629-0539 | 09/25/2016 | 09/24/2017 |
| Wave Tube Amplifier 48 GHz at 20Watt | Hughes Aircraft Company | 1277H02F000 | 102 | 09/25/2016 | 09/24/2017 |

Note:

- 1) Per KDB865664D01 requirements for dipole calibration, the test laboratory has adopted three year extended calibration interval. Each measured dipole is expected to evalute with following criteria at least on annual interval.
- a) There is no physical damage on the dipole;
- b) System check with specific dipole is within 10% of calibrated values;
- c) The most recent return-loss results, measued at least annually, deviates by no more than 20% from the previous measurement;
- d) The most recent measurement of the real or imaginary parts of the impedance, measured at least annually is within 5Ω from the provious measurement.
- 2) Network analyzer probe calibration against air, distilled water and a shorting block performed before measuring liquid parameters.

3.SAR MEASUREMENTS SYSTEM CONFIGURATION

3.1. SARMeasurement Set-up

The OPENSAR system for performing compliance tests consist of the following items:

A standard high precision 6-axis robot (KUKA) with controller and software.

KUKA Control Panel (KCP)

A dosimetric probe, i.e., an isotropic E-field probe optimized and calibrated for usage in tissue simulating liquid. The probe is equipped with a Video Positioning System(VPS).

The stress sensor is composed with mechanical and electronic when the electronic part detects a change on the electro-mechanical switch, It sends an "Emergency signal" to the robot controller that to stop robot's moves

A computer operating Windows XP.

OPENSAR software

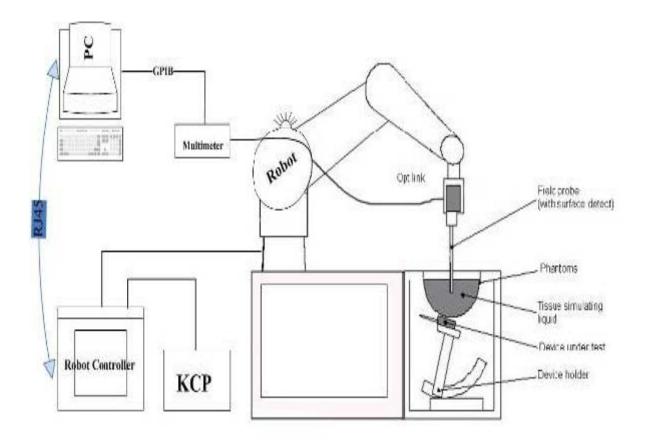
Remote control with teaches pendant and additional circuitry for robot safety such as warning lamps, etc.

The SAM phantom enabling testing left-hand right-hand and body usage.

The Position device for handheld EUT

Tissue simulating liquid mixed according to the given recipes .

System validation dipoles to validate the proper functioning of the system.



3.2. OPENSAR E-field Probe System

The SAR measurements were conducted with the dosimetric probe EP220 (manufactured by SATIMO), designed in the classical triangular configuration and optimized for dosimetric evaluation.

Probe Specification

ConstructionSymmetrical design with triangular core

Interleaved sensors

Built-in shielding against static charges

PEEK enclosure material (resistant to organic solvents, e.g., DGBE)

CalibrationISO/IEC 17025 calibration service available.

Frequency 700 MHz to 3 GHz;

Linearity: 0.25dB(700 MHz to 3GHz)

Directivity 0.25 dB in HSL (rotation around probe axis)

0.5 dB in tissue material (rotation normal to probe axis)

Dynamic Range 0.01W/kg to > 100 W/kg;

Linearity: 0.25 dB

Dimensions Overall length: 330 mm (Tip: 16mm)

Tip diameter: 5 mm (Body: 8 mm)

Distance from probe tip to sensor centers: 2.5 mm

Application General dosimetry up to 3 GHz

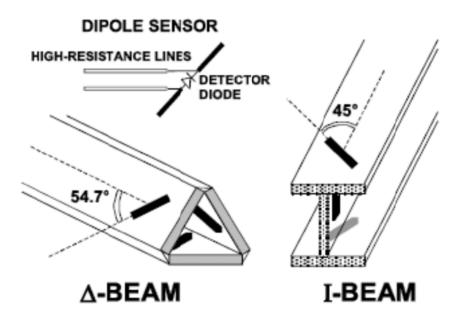
Dosimetry in strong gradient fields Compliance tests of Mobile Phones



Isotropic E-Field Probe

The isotropic E-Field probe has been fully calibrated and assessed for isotropicity, and boundary effect within a controlled environment. Depending on the frequency for which the probe is calibrated the method utilized for calibration will change.

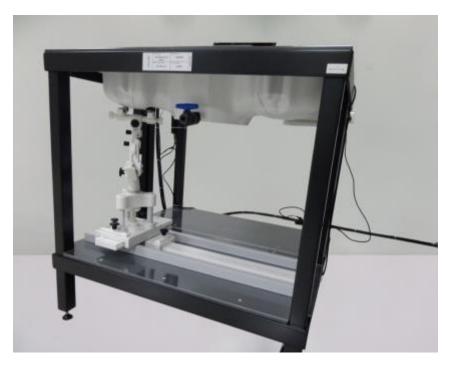
The E-Field probe utilizes a triangular sensor arrangement as detailed in the diagram below:



3.3. Phantoms

The SAM Phantom SAM117 is constructed of a fiberglass shell integrated in a wooden table. The shape of the shell is in compliance with the specification set in IEEE P1528 and CENELEC EN62209-1, EN62209-2:2010. The phantom enables the dosimetric evaluation of left and right hand phone usage as well as body mounted usage at the flat phantom region. A cover prevents the evaporation of the liquid. Reference markings on the Phantom allow the complete setup of allpredefined phantom positions and measurement grids by manually teaching three points in the robo

System checking was performed using the flat section, whilst Head SAR tests used the left and right head profile sections. Body SAR testing also used the flat section between the head profiles.



SAM Twin Phantom

3.4. Device Holder

In combination with the Generic Twin PhantomSAM117, the Mounting Device enables the rotation of the mounted transmitter in spherical coordinates whereby the rotation points is the ear opening. The devices can be easily, accurately, and repeatedly positioned according to the FCC and CENELEC specifications. The device holder can be locked at different phantom locations (left head, right head, flat phantom).



Device holder supplied by SATIMO

3.5. Scanning Procedure

The procedure for assessing the peak spatial-average SAR value consists of the following steps

Power Reference Measurement

The reference and drift jobs are useful jobs for monitoring the power drift of the device under test in the batch process. Both jobs measure the field at a specified reference position, at a selectable distance from the phantom surface. The reference position can be either the selected section's grid reference point or a user point in this section. The reference job projects the selected point onto the phantom surface, orients the probe perpendicularly to the surface, and approaches the surface using the selected detection method.

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 of 15 mm x 15 mm is set. During the 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.

| | ≤ 3 GHz | > 3 GHz | |
|--|--|--|--|
| Maximum distance from closest measurement point (geometric center of probe sensors) to phantom surface | $5 \text{ mm} \pm 1 \text{ mm}$ | $\frac{1}{2} \cdot \delta \cdot \ln(2) \text{ mm} \pm 0.5 \text{ mm}$ | |
| 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. | | |

Zoom Scan

Zoom Scans are used to estimate the peak spatial SAR values within a cubic averaging volume containing 1 g and 10 g of simulated tissue. The default Zoom Scan is done by 7x7x7 points within a cube whose base is centered around the maxima found in the preceding area scan.

| snatial res | olution: Avz Avz | \leq 2 GHz: \leq 8 mm | $3-4~\text{GHz} : \leq 5~\text{mm}^*$ |
|---|---|--|---|
| Transmittin Zoom Sean Spatial Pesolation. Entzoom, Elyzoom | | | 4 – 6 GHz: ≤ 4 mm* |
| | | | $3-4$ GHz: ≤ 4 mm |
| uniform grid: Δz _{Zoom} (n) | | \leq 5 mm | $4-5$ GHz: ≤ 3 mm |
| | | | $5-6$ GHz: ≤ 2 mm |
| graded grid Δz _{Zoom} (1): between 1st two points closest to phantom surface | | ≤ 4 mm | $3 - 4 \text{ GHz} \le 3 \text{ mm}$ $4 - 5 \text{ GHz} \le 2.5 \text{ mm}$ $5 - 6 \text{ GHz} \le 2 \text{ mm}$ |
| grid | Δz _{Zoom} (n>1): between subsequent points | $\leq 1.5 \cdot \Delta z_{Z\infty}$ | _m (n-1) mm |
| x, y, z | | \geq 30 mm | 3 – 4 GHz: ≥ 28 mm 4 – 5 GHz: ≥ 25 mm 5 – 6 GHz: ≥ 22 mm |
| | uniform graded grid | $\begin{array}{c} \Delta z_{Zoom}(1)\text{: between} \\ 1^{st} \text{ two points closest} \\ \text{to phantom surface} \\ \hline \Delta z_{Zoom}(n > 1)\text{:} \\ \text{between subsequent} \\ \text{points} \end{array}$ | partial resolution: Δx_{Zoom} , Δy_{Zoom} $2-3 \text{ GHz: } \leq 5 \text{ mm}^*$ uniform grid: $\Delta z_{Zoom}(n)$ $\leq 5 \text{ mm}$ $\begin{array}{c} \Delta z_{Zoom}(1)\text{: between} \\ 1^{st} \text{ two points closest} \\ \text{to phantom surface} \\ \hline \Delta z_{Zoom}(n>1)\text{: between subsequent} \\ \text{between subsequent} \\ \hline \end{pmatrix} \leq 4 \text{ mm}$ |

Note: δ is the penetration depth of a plane-wave at normal incidence to the tissue medium; see IEEE Std 1528-2013 for details.

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

Power Drift measurement

The drift job measures the field at the same location as the most recent reference job within the same procedure, and with the same settings. The drift measurement gives the field difference in dB from the reading conducted within the last reference measurement. Several drift measurements are possible for one reference measurement. This allows a user to monitor the power drift of the device under test within a batch process. In the properties of the Drift job, the user can specify a limit for the drift and have OPENSAR software stop the measurements if this limit is exceeded.

3.6. Data Storage and Evaluation

Data Storage

The OPENSAR 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. 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 setup, 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.

Data Evaluation

The OPENSAR 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 Normi, ai0, ai1, ai2

> - Conversion factor ConvFi - Diode compression point Dcpi

Device parameters: - Frequency

- Crest factor cf

Media parameters: - Conductivity σ - 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 OPENSAR 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 DCtransmission 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:

$$V_i = U_i + U_i^2 \cdot \frac{cf}{dcp_i}$$

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

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

cf = crest factor of exciting field

dcpi = diode compression point

Normi

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

E – fieldprobes :
$$E_i = \sqrt{\frac{V_i}{Norm \cdot ConvF}}$$

$$H- ext{fieldprobes}: \qquad H_i = \sqrt{V_i} \cdot \frac{a_{i0} + c_{i1}f + a_{i2}f^2}{f}$$
 all of channel i
$$(\mathbf{i} = \mathbf{x}, \, \mathbf{y}, \, \mathbf{z})$$
 ($\mathbf{i} = \mathbf{x}, \, \mathbf{y}, \, \mathbf{z}$)

= compensated signal of channel i With Vi

= sensor sensitivity of channel i

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

ConvF = sensitivity enhancement in solution

aij = sensor sensitivity factors for H-field probes

f = carrier frequency [GHz]

Ei = electric field strength of channel i in V/m
Hi = magnetic field strength of channel i in A/m

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

$$E_{tot} = \sqrt{E_x^2 + E_y^2 + E_z^2}$$

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

$$SAR = E_{tot}^2 \cdot \frac{\sigma}{\rho \cdot 1'000}$$

with SAR = local specific absorption rate in mW/g

Etot = total field strength in V/m

σ = conductivity in [mho/m] or [Siemens/m] ρ = equivalent tissue density in g/cm3

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.

3.7. Position of the wireless device in relation to the phantom

General considerations

This standard specifies two handset test positions against the head phantom – the "cheek" position and the "tilt" position.

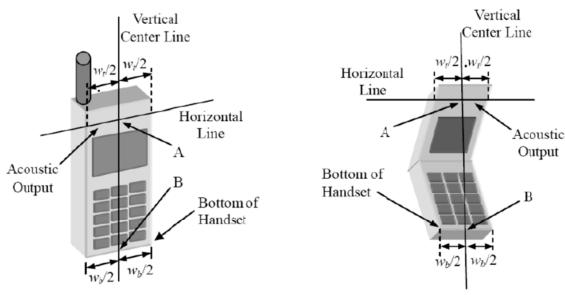
The power flow density is calculated assuming the excitation field as a free space field

$$P_{\text{(pwe)}} = \frac{E_{\text{tot}}^2}{3770} \text{ or } P_{\text{(pwe)}} = H_{\text{tot}}^2.37.7$$

Where P_{pwe}=Equivalent power density of a plane wave in mW/cm2

E_{tot}=total electric field strength in V/m

H_{tot}=total magnetic field strength in A/m



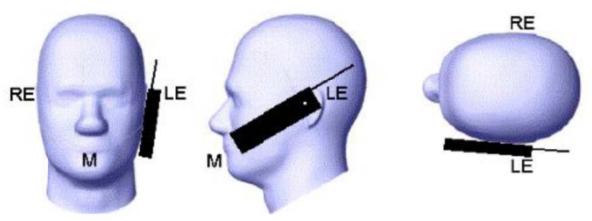
Wt Width of the handset at the level of the acoustic

W_bWidth of the bottom of the handset

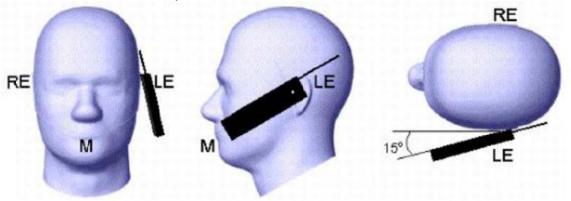
A Midpoint of the widthwtof the handset at the level of the acoustic output

B Midpoint of the width w_b of the bottom of the handset

Picture 1-a Typical "fixed" case handset Picture 1-b Typical "clam-shell" case handset



Picture 2 Cheek position of the wireless device on the left side of SAM



Picture 3 Tilt position of the wireless device on the left side of SAM

For body SAR test we applied to FCC KDB447498 D01v06.

3.8. Tissue Dielectric Parameters for Head and Body Phantoms

The liquid is consisted of water,salt,Glycol,Sugar,Preventol and Cellulose.The liquid has previously been proven to be suited for worst-case.It's satisfying the latest tissue dielectric parameters requirements proposed by the KDB865664.

The composition of the tissue simulating liquid

| Frequency (MHz) | Bactericide | DGBE | HEC | NaCl | Sucrose | 1,2- Propan ediol | X100 | Water | Conductivity | Permittivity |
|-----------------|-------------|-------|-----|------|---------|-------------------------|-------|-------|--------------|--------------|
| | % | % | % | % | % | % | % | % | σ | ٤r |
| 750 | / | 1 | / | 0.79 | 1 | 64.81 | / | 34.40 | 0.97 | 41.8 |
| 835 | / | 1 | / | 0.79 | 1 | 64.81 | / | 34.40 | 0.97 | 41.8 |
| 900 | / | 1 | / | 0.79 | 1 | 64.81 | / | 34.40 | 0.97 | 41.8 |
| 1800 | / | 13.84 | / | 0.35 | 1 | / | 30.45 | 55.36 | 1.38 | 41.0 |
| 1900 | / | 13.84 | / | 0.35 | 1 | / | 30.45 | 55.36 | 1.38 | 41.0 |
| 2000 | / | 7.99 | / | 0.16 | 1 | / | 19.97 | 71.88 | 1.55 | 41.1 |
| 2450 | / | 7.99 | / | 0.16 | 1 | 1 | 19.97 | 71.88 | 1.88 | 40.3 |
| 2600 | / | 7.99 | / | 0.16 | 1 | 1 | 19.97 | 71.88 | 1.88 | 40.3 |

| Target Frequency | iency Head | | В | ody |
|------------------|-------------------|--------|----------------|--------|
| (MHz) | $\epsilon_{ m r}$ | σ(S/m) | ε _r | σ(S/m) |
| 150 | 52.3 | 0.76 | 61.9 | 0.80 |
| 300 | 45.3 | 0.87 | 58.2 | 0.92 |
| 450 | 43.5 | 0.87 | 56.7 | 0.94 |
| 835 | 41.5 | 0.90 | 55.2 | 0.97 |
| 900 | 41.5 | 0.97 | 55.0 | 1.05 |
| 915 | 41.5 | 0.98 | 55.0 | 1.06 |
| 1450 | 40.5 | 1.20 | 54.0 | 1.30 |
| 1610 | 40.3 | 1.29 | 53.8 | 1.40 |
| 1800-2000 | 40.0 | 1.40 | 53.3 | 1.52 |
| 2450 | 39.2 | 1.80 | 52.7 | 1.95 |
| 2600 | 39.0 | 1.96 | 52.5 | 2.16 |
| 3000 | 38.5 | 2.40 | 52.0 | 2.73 |
| 5800 | 35.3 | 5.27 | 48.2 | 6.00 |

3.9. Tissue equivalent liquid properties

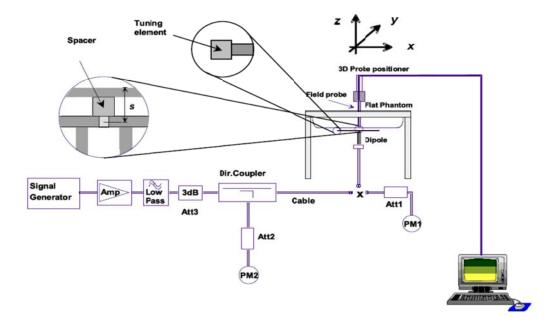
Dielectric Performance of Head and Body Tissue Simulating Liquid

| Biologino i oriormanos or rioda ana Body riodas emidianing Enqui | | | | | | | 14.4 | | |
|--|------------------------|-------------------|-------|-------------------------------|--------|-------|--------|-----------------|------------|
| Tissue | Measured Target Tissue | | | Target Tissue Measured Tissue | | | | | |
| Type | Frequency (MHz) | $\epsilon_{ m r}$ | σ | ε _r | Dev. | σ | Dev. | Liquid Temp. | Test Data |
| 835B | 835 | 0.96 | 53.46 | 0.93 | -3.12% | 53.19 | -0.51% | 22.2 | 09/29/2016 |
| 1900B | 1900 | 1.54 | 54.20 | 1.51 | -1.95% | 54.31 | 0.20% | 22.2 | 09/29/2016 |

3.10. System Check

The purpose of the system check is to verify that the system operates within its specifications at the decice test frequency. The system check is simple check of repeatability to make sure that the system works correctly at the time of the compliance test;

System check results have to be equal or near the values determined during dipole calibration with the relevant liquids and test system (±10 %).



The output power on dipole port must be calibrated to 20 dBm (100mW) before dipole is connected.



Photo of Dipole Setup

| Mixtur e | Frequen | Power | SAR _{1g} | SAR _{10g} | Drift | 1W Ta | arget | | rence entage | Liquid | Date |
|-------------|-------------|------------------------|-------------------|--------------------|-------|-----------------------------|------------------------------|-------|-----------------|--------|--------|
| Туре | cy (MHz) | rowei | (W/Kg) | (W/Kg) | (%) | SAR _{1g} (W/Kg) | SAR _{10g} (W/Kg) | 1g | 10g | Temp | Date |
| | | 100 mW | 0.976 | 0.631 | | | | | | | 09/29/ |
| Body | 835 | Normalize to 1 Watt | 9.76 | 6.31 | 3.27 | 9.90 | 6.39 | -1.41 | -1.25 | 22.2 | 2016 |
| | | 100 mW | 4.345 | 2.139 | | | | | | | 09/30/ |
| Body | 1900 | Normalize to 1 Watt | 43.45 | 21.39 | -1.69 | 43.33 | 21.59 | 0.28 | -0.93 | 22.2 | 2016 |

3.11. SAR measurement procedure

The measurement procedures are as follows:

3.11.1 Conducted power measurement

- a. For WWAN power measurement, use base station simulator connection with RF cable, at maximum power in each supported wireless interface and frequency band.
- 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.

3.11.2 GSM Test Configuration

SAR tests for GSM 850 and GSM 1900, a communication link is set up with a System Simulator (SS) by air link. Using CMU200 the power level is set to "5" for GSM 850, set to "0" for GSM 1900. Since the GPRS class is 12 for this EUT, it has at most 4 timeslots in uplink and at most 4 timeslots in downlink, the maximum total timeslots is 5. the EGPRS class is 12 for this EUT, it has at most 4 timeslots in uplink and at most 4 timeslots in downlink, the maximum total timeslots is 5.

SAR test reduction for GPRS and EDGE modes is determined by the source-based time-averaged output power specified for production units, including tune-up tolerance. The data 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. GSM voice and GPRS data use GMSK, which is a constant amplitude modulation with minimal peak to average power difference within the time-slot burst. For EDGE, GMSK is used for MCS 1 – MCS 4 and 8-PSK is used for MCS 5 – MCS 9; where 8-PSK has an inherently higher peak-to-average power ratio. The GMSK and 8-PSK EDGE configurations are considered separately for SAR compliance. The GMSK EDGE configurations are grouped with GPRS and considered with respect to time-averaged maximum output power to determine compliance. The 3G SAR test reduction procedure is applied to 8-PSK EDGE with GMSK GPRS/EDGE as the primary mode.

3.12. Power Reduction

The product without any power reduction.

3.13. Power Drift

To control the output power stability during the SAR test, SAR system calculates the power drift by measuring the E-field at the same location at the beginning and at the end of the measurement for each test position. This ensures that the power drift during one measurement is within 5%.

4.TEST CONDITIONS AND RESULTS

4.1. Conducted Power Results

Max Conducted power measurement results and power drift from tune-up tolerance provide by manufacturer:

Conducted power measurement results for GSM850/PCS1900

| | | Burst Co | Burst Conducted power (dBm) | | | Average power (dBm) | | |
|---------|--|-----------|-----------------------------|------------------------|--------------|---------------------|-----------|-----------|
| GSN | GSM 850 Channel/Frequency(MHz) | | 1 | Channel/Frequency(MHz) | | | | |
| | | 128/824.2 | 190/836.6 | 251/848.8 | | 128/824.2 | 190/836.6 | 251/848.8 |
| | 1TX slot | 32.53 | 32.19 | 32.13 | -9.03dB | 23.50 | 23.16 | 23.10 |
| GPRS | 2TX slot | 30.37 | 30.33 | 30.02 | -6.02dB | 24.35 | 24.31 | 24.00 |
| (GMSK) | 3TX slot | 29.51 | 29.14 | 29.45 | -4.26dB | 25.25 | 24.88 | 25.19 |
| | 4TX slot | 27.93 | 27.61 | 27.26 | -3.01dB | 24.92 | 24.60 | 24.25 |
| Burst C | | Burst Co | nducted pow | er (dBm) | | Average power (dBm) | | |
| GSM | GSM 1900 Channel/Frequency(MHz) 512/ 661/ 810/ | | , | Chann | el/Frequency | /(MHz) | | |
| GSIVI | | | 810/ | ' | 512/ | 661/ | 810/ | |
| | | 1850.2 | 1880 | 1909.8 | | 1850.2 | 1880 | 1909.8 |
| | 1TX slot | 29.56 | 29.66 | 28.95 | -9.03dB | 20.53 | 20.63 | 19.92 |
| GPRS | 2TX slot | 27.34 | 27.19 | 27.05 | -6.02dB | 21.32 | 21.17 | 21.03 |
| (GMSK) | 3TX slot | 25.18 | 25.06 | 25.11 | -4.26dB | 20.92 | 20.80 | 20.85 |
| | 4TX slot | 24.38 | 24.73 | 23.97 | -3.01dB | 21.37 | 21.72 | 20.96 |

Notes:

1. Division Factors

To average the power, the division factor is as follows:

1TX-slot = 1 transmit time slot out of 8 time slots=> conducted power divided by (8/1) => -9.00dB

2TX-slots = 2 transmit time slots out of 8 time slots=> conducted power divided by (8/2) => -6.00dB

3TX-slots = 3 transmit time slots out of 8 time slots=> conducted power divided by (8/3) => -4.26dB

4TX-slots = 4 transmit time slots out of 8 time slots=> conducted power divided by (8/4) => -3.00dB

2. According to the conducted power as above, the GPRS measurements are performed with 3Txslot for GPRS850 and 2Txslot GPRS1900.

Conducted power measurement of BluetoothV4.0

| Mode | channel | Frequency (MHz) | Conducted output power Average (dBm) |
|-------|---------|--------------------|--------------------------------------|
| | 0 | 2402 | -1.67 |
| BT-LE | 19 | 2440 | -1.22 |
| | 39 | 2480 | -1.59 |

4.2. Manufacturing tolerance

| | GSM 850 GPRS (GMSK) (Burst Average Power) | | | | | | | |
|------------|--|------|------|------|--|--|--|--|
| Cha | annel | 128 | 190 | 251 | | | | |
| 1 Txslot | Target (dBm) | 32.0 | 32.0 | 32.0 | | | | |
| 1 1 XSIOL | Tolerance ±(dB) | 1.0 | 1.0 | 1.0 | | | | |
| 2 Txslot | Target (dBm) | 30.0 | 30.0 | 30.0 | | | | |
| 2 1 XSIUL | Tolerance ±(dB) | 1.0 | 1.0 | 1.0 | | | | |
| 2 Typlot | Target (dBm) | 29.0 | 29.0 | 29.0 | | | | |
| 3 Txslot | Tolerance ±(dB) | 1.0 | 1.0 | 1.0 | | | | |
| 4 Txslot | Target (dBm) | 27.0 | 27.0 | 27.0 | | | | |
| 4 1 X SIOL | Tolerance ±(dB) | 1.0 | 1.0 | 1.0 | | | | |
| | GSM 1900 GPRS (GMSK) (Burst Average Power) | | | | | | | |
| Cha | annel | 512 | 661 | 810 | | | | |
| 1 Txslot | Target (dBm) | 29.0 | 29.0 | 29.0 | | | | |
| 1 1 XSIOL | Tolerance ±(dB) | 1.0 | 1.0 | 1.0 | | | | |
| 2 Txslot | Target (dBm) | 27.0 | 27.0 | 27.0 | | | | |
| Z TXSIOL | Tolerance ±(dB) | 1.0 | 1.0 | 1.0 | | | | |

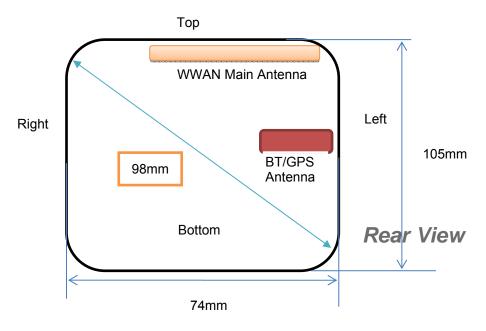
| SHENZHEN LCS COMPLIANCE TESTING LABORATORY LTD. FCC ID: 2AJ5H-LUGLOC002 Report No.: LCS1611030274E |
|--|
|--|

| 3 Txslot | Target (dBm) | 25.0 | 25.0 | 25.0 |
|------------|-----------------|------|------|------|
| 3 1 X SIUL | Tolerance ±(dB) | 1.0 | 1.0 | 1.0 |
| 4 Tyolot | Target (dBm) | 24.0 | 24.0 | 24.0 |
| 4 Txslot | Tolerance ±(dB) | 1.0 | 1.0 | 1.0 |

Bluetooth V4.0

| BLE-GFSK (Average) | | | | | | | | |
|--------------------|-----------|------------|------------|--|--|--|--|--|
| Channel | Channel 0 | Channel 19 | Channel 39 | | | | | |
| Target (dBm) | -1.0 | -1.0 | -1.0 | | | | | |
| Tolerance ±(dB) | 1.0 | 1.0 | 1.0 | | | | | |

4.3. Transmit Antennas and SAR Measurement Position



Antenna information:

| WWAN Main Antenna | GSM/TX/RX |
|-------------------|-----------|
| GPS/BT Antenna | BT TX/RX |

| Distance of The Antenna to the EUT surface and edge | | | | | | | | | | |
|--|------|------|------|------|-----|------------|--|--|--|--|
| Antennas Front Back Top Side Bottom Side Left Side Right | | | | | | Right Side | | | | |
| WWAN | <5mm | <5mm | 11mm | 80mm | 9mm | 14mm | | | | |
| BT | <5mm | <5mm | 41mm | 62mm | 7mm | 54mm | | | | |

4.4. Standalone SAR Test Exclusion Considerations

Per KDB 447498 D01v06, 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:

[(max. power of channel, including tune-up tolerance, mW)/(min. test separation distance, mm)] $[\sqrt{f(GHz)}] \le 3.0$ 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

| | Standalone SAR test exclusion considerations | | | | | | | | | | | |
|----------------------|--|---------------|--------------------------------------|--------------------------------|-----------------------|--------------------------------|--------------------------------|--|--|--|--|--|
| Communication system | Frequency (MHz) | Configuration | Maximum Average Power (dBm) | Separation Distance (mm) | Calculation Result | SAR Exclusion Thresholds | Standalone SAR Exclusion | | | | | |
| GSM 850 | 850 | Rear Size | 25.74 | 5 | 69.1 | 3.0 | no | | | | | |
| G3W 650 | | Front Size | 25.74 | 5 | 69.1 | 3.0 | no | | | | | |
| CSM 1000 | 1000 | Rear Size | 21.99 | 5 | 43.6 | 3.0 | no | | | | | |
| GSM 1900 | 1900 | Front Size | 21.99 | 5 | 43.6 | 3.0 | no | | | | | |
| Bluetooth* | 2450 | Rear Size | 0.00 | 5 | 0.3 | 3.0 | yes | | | | | |
| | 2450 | Front Size | 0.00 | 5 | 0.3 | 3.0 | yes | | | | | |

Remark:

- 1. Maximum average power including tune-up tolerance;
- 2. When the minimum test separation distance is < 5 mm, a distance of 5 mm is applied to determine SAR test exclusion
- 3. Body-worn measure distance is 0mm as body use distance is 0mm from manufacturer declaration of user manual.

4.5. Standalone Estimated SAR

Per KDB447498 requires when the standalone SAR test exclusion of section 4.3.1 is applied to an antenna that transmits simultaneously with other antennas, the standalone SAR must be estimated according to the following to determine simultaneous transmission SAR test exclusion;

- (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.
- 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

Per FCC KD B447498 D01, simultaneous transmission SAR test exclusion may be applied when the sum of the 1-g SAR for all the transmitting antenna in a specific a physical test configuration is ≤1.6 W/Kg. When the sum is greater than the SAR limit, SAR test exclusion is determined by the SAR to peak location separation ratio.

Ratio=
$$\frac{(SAR_1 + SAR_2)^{1.5}}{(peak location separation,mm)} < 0.04$$

| | Estimated stand alone SAR | | | | | | | | | | | |
|----------------------|---------------------------|---------------|---------------------------|--------------------------------|---|--|--|--|--|--|--|--|
| Communication system | Frequency (MHz) | Configuration | Maximum Power (dBm) | Separation Distance (mm) | Estimated SAR _{1-g} (W/kg) | | | | | | | |
| Bluetooth* | 2450 | Rear Size | 0.00 | 5.00 | 0.042 | | | | | | | |
| | 2450 | Front Size | 0.00 | 5.00 | 0.042 | | | | | | | |

Remark:

- 1. Maximum average power including tune-up tolerance;
- 2. Bluetooth including BLE-Lower Energy Bluetooth and Classical Bluetooth;
- 3. When the minimum test separation distance is < 5 mm, a distance of 5 mm is applied to determine SAR test exclusion

4.6. Standalone SAR Measurement Results

The calculated SAR is obtained by the following formula:

Reported SAR=Measured SAR*10^{(Ptarget-Pmeasured))/10}
Scaling factor=10^{(Ptarget-Pmeasured))/10}

Reported SAR= Measured SAR* Scaling factor

Where

P_{target} is the power of manufacturing upper limit;

P_{measured} is the measured power;

Measured SAR is measured SAR at measured power which including power drift)

Reported SAR which including Power Drift and Scaling factor

| SHENZHEN LCS COMPLIANCE TESTING LABORATORY LTD. FCC ID: 2AJ5H-LUGLOC002 Report No.: LCS1611030274E |
|--|
|--|

Duty Cycle

| | - 1 - 1 - 1 |
|-----------|-------------|
| Test Mode | Duty Cycle |
| GPRS850 | 1:2.67 |
| GPRS1900 | 1:2 |

Table 5: SAR Values [GSM 850 (GPRS)]

| | | | | Conducted | Maximum | Power | | SAR _{1-g} res | ults(W/kg) | | | |
|-----|--|---------------|------------------|----------------|---------------------------|--------------|-------------------|------------------------|------------|------------------|--|--|
| Ch. | Freq. (MHz) | Time slots | Test Position | Power (dBm) | Allowed Power (dBm) | Drift (%) | Scaling Factor | Measured | Reported | Graph Results | | |
| | measured / reported SAR numbers - Body (Body-worn, distance 0mm) | | | | | | | | | | | |
| 190 | 836.6 | 3Txslots | Front | 29.14 | 30.00 | 0.26 | 1.219 | 0.452 | 0.551 | | | |
| 190 | 836.6 | 3Txslots | Rear | 29.14 | 30.00 | 4.35 | 1.219 | 0.863 | 1.052 | Plot 1 | | |
| 128 | 824.2 | 3Txslots | Rear | 29.51 | 30.00 | 2.23 | 1.119 | 0.804 | 0.900 | | | |
| 251 | 848.8 | 3Txslots | Rear | 29.45 | 30.00 | 1.86 | 1.135 | 0.784 | 0.890 | | | |

Remark:

- 1. The value with blue color is the maximum SAR Value of each test band.
- 2. Per FCC KDB Publication 447498 D01, if the reported (scaled) SAR measured at the middle channel or highest output power channel for each test configuration is \leq 0.8 W/kg then testing at the other channels is optional for such test configuration(s).
- 3. When multiple slots are used, SAR should be tested to account for the maximum source-based time-averaged output power.
- 4. Per KDB 648474 D04, when the reported SAR for a body-worn accessory measured without a headset connected to the handset is ≤ 1.2 W/kg, SAR testing with a headset connected to the handset is not required.

Table 6: SAR Values [GSM 1900 (GPRS)]

| | 10000 (0100) | | | | | | | | | | | |
|-----|--|---------------|------------------|------------------------|---------------------------|--------------|-------------------|----------|----------|------------------|--|--|
| | Conducted Maximum Po | Power | | SAR _{1-g} res | | | | | | | | |
| Ch. | Freq. (MHz) | time slots | Test Position | Power (dBm) | Allowed Power (dBm) | Drift (%) | Scaling Factor | Measured | Reported | Graph Results | | |
| | measured / reported SAR numbers – Body (Body-worn, distance 0mm) | | | | | | | | | | | |
| 661 | 1880.0 | 4Txslots | Front | 24.73 | 25.00 | -3.45 | 1.064 | 0.270 | 0.287 | | | |
| 661 | 1880.0 | 4Txslots | Rear | 24.73 | 25.00 | 1.21 | 1.064 | 0.483 | 0.514 | Plot 2 | | |

Remark:

- 1. The value with blue color is the maximum SAR Value of each test band.
- 2. Per FCC KDB Publication 447498 D01, if the reported (scaled) SAR measured at the middle channel or highest output power channel for each test configuration is \leq 0.8 W/kg then testing at the other channels is optional for such test configuration(s).
- 3. When multiple slots are used, SAR should be tested to account for the maximum source-based time-averaged output power.
- 4. Per KDB 648474 D04, when the reported SAR for a body-worn accessory measured without a headset connected to the handset is ≤ 1.2 W/kg, SAR testing with a headset connected to the handset is not required.

4.7. Simultaneous TX SAR Considerations

4.7.1 Introduction

The following procedures adopted from "FCC SAR Considerations for Cell Phones with Multiple Transmitters" are applicable to handsets with built-in unlicensed transmitters. Bluetooth devices which may simultaneously transmit with the licensed transmitter.

For the DUT, the BT modules using a antenna, GSM modules sharing same single antenna; Application Simultaneous Transmission information:

| <u>SH1</u> | ENZHEN LCS COMI | PLIANCE TESTING LABORA | TORY LTD. | FCC ID: 2AJ5H-LUGLOC002 | Report No.: LCS1611030274E |
|------------|-----------------|------------------------|-----------|----------------------------|--|
| | Air-Interface | Band (MHz) | Туре | Simultaneous Transmissions | Voice over Digital Transport(Data) |

 GSM
 GPRS
 DT
 Yes, BLE
 N/A

 BLE
 2450
 DT
 Yes,GPRS
 N/A

 Note: DT-Digital Transport
 N/A
 N/A
 N/A

Remark:

1. Bluetooth including BLE-Lower Energy Bluetooth and Classical Bluetooth;

4.7.2 Evaluation of Simultaneous SAR

The following tables list information which is relevant for the decision if a simultaneous transmit evaluation is necessary according to FCC KDB 447498D01 General RF Exposure Guidance v06.

| reported SAR WWAN and BT 2.4GHz, ΣSAR evaluation, SPLSRi | | | | | | | | | | |
|--|----------------|-----------------------------|-------|----------|----------|---------|--|--|--|--|
| Frequency | Position | SAR _{1-qmax} /W/kg | | ΣSAR | Distance | Ratio | | | | |
| band | Position | WWAN | BT | <1.6W/Kg | Ri, mm | ≤ 0.040 | | | | |
| GPRS850 | rear side 0mm | 1.052 | 0.042 | 1.094 | | | | | | |
| | front side 0mm | 0.551 | 0.042 | 0.593 | | | | | | |
| CDDC1000 | rear side 0mm | 0.514 | 0.042 | 0.556 | | | | | | |
| GPRS1900 | front side 0mm | 0.287 | 0.042 | 0.329 | | | | | | |

Remark:

- 1. The value with block color is the maximum values of standalone
- 2. The value with blue color is the maximum values of $\sum SAR_{1-\alpha}$

4.7.3 Conclusion:

ΣSAR < 1.6 W/Kg, no need consider SAR-to-(peak-locations spacing) ratio (SPLSRi) , therefore simultaneous transmissions SAR measurement with the enlarged zoom scan measurement and volume scan post-processing procedures is not required.

4.7.4 SAR Peak Location Separation

Not required as ΣSAR < 1.6 W/Kg

4.8. SAR Measurement Variability

According to KDB865664, Repeated measurements are required only when the measured SAR is \geq 0.80 W/kg. If the measured SAR value of the initial repeated measurement is < 1.45 W/kg with \leq 20% variation, only one repeated measurement is required to reaffirm that the results are not expected to have substantial variations, which may introduce significant compliance concerns. A second repeated measurement is required only if the measured result for the initial repeated measurement is within 10% of the SAR limit and vary by more than 20%, which are often related to device and measurement setup difficulties. The following procedures are applied to determine if repeated measurements are required. The same procedures should be adapted for measurements according to extremity and occupational exposure limits by applying a factor of 2.5 for extremity exposure and a factor of 5 for occupational exposure to the corresponding SAR thresholds.19 The repeated measurement results must be clearly identified in the SAR report. All measured SAR, including the repeated results, must be considered to determine compliance and for reporting according to KDB 690783.Repeated measurement is not required when the original highest measured SAR is < 0.80 W/kg; steps 2) through 4) do not apply.

- 1) When the original highest measured SAR is ≥ 0.80 W/kg, repeat that measurement once.
- 2) Perform a second repeated measurement only if the ratio of largest to smallest SAR for the original and first repeated measurements is > 1.20 or when the original or repeated measurement is ≥ 1.45 W/kg (~ 10% from the 1-g SAR limit).
- 3) Perform a third repeated measurement only if the original, first or second repeated measurement is ≥ 1.5 W/kg and the ratio of largest to smallest SAR for the original, first and second repeated measurements is > 1.20.
- 4) Perform a third repeated measurement only if the original, first or second repeated measurement is ≥ 1.5 W/kg and the ratio of largest to smallest SAR for the original, first and second repeated measurements is > 1.20

| SHENZHEN LCS COMPLIANCE TESTING LABORATORY LTD. | FCC ID: 2AJ5H-LUGLOC002 | Report No.: LCS1611030274E |
|---|-------------------------|----------------------------|
| | | |

| | | | | | | First Repeated | |
|-------------------|---------------|---------------------------------|------------------|-----------------------------|---|---|---|
| Frequency Band | Air Interface | RF Exposure Configuration | Test Position | Repeated SAR (yes/no) | Highest Measured SAR _{1-q} (W/Kg) | Measued SAR _{1-g} (W/Kg) | Largest to Smallest SAR Ratio |
| 850MHz | GSM850 | Standalone | Body-Rear | yes | 0.863 | 0.852 | 0.902 |
| 1900MHz | GSM1900 | Standalone | Body-Rear | no | 0.483 | n/a | n/a |

4.9. General description of test procedures

- 1. The DUT is tested using CMU 200 communications testers as controller unit to set test channels and maximum output power to the DUT, as well as for measuring the conducted peak power.
- 2. Test positions as described in the tables above are in accordance with the specified test standard.
- 3. Tests in body position were performed in that configuration, which generates the highest time based averaged output power (see conducted power results).
- 4. Tests in head position with GSM were performed in voice mode with 1 timeslot unless GPRS/EGPRS/DTM function allows parallel voice and data traffic on 2 or more timeslots.
- 5. According to IEEE 1528 the SAR test shall be performed at middle channel. Testing of top and bottom channel is optional.
- 6. According to KDB 447498 D01 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
- 7. IEEE 1528-2003 require the middle channel to be tested first. This generally applies to wireless devices that are designed to operate in technologies with tight tolerances for maximum output power variations across channels in the band. When the maximum output power variation across the required test channels is > ½ dB, instead of the middle channel, the highest output power channel must be used.
- 8. Per KDB648474 D04 require when the reported SAR for a body-worn accessory, measured without a headset connected to the handset, is < 1.2 W/kg.

4.10. Measurement Uncertainty (300MHz-3GHz)

Not required as SAR measurement uncertainty analysis is required in SAR reports only when the highest measured SAR in a frequency band is \geq 1.5 W/kg for 1-g SAR according to KDB865664D01.

4.11. System Check Results

Test mode:835MHz(Body)
Product Description:Validation

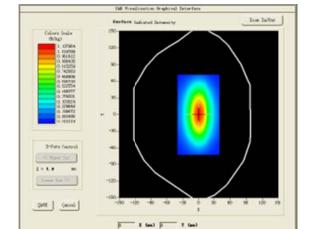
Model:Dipole SID835

E-Field Probe: SSE5(SN17/14 EPG214)

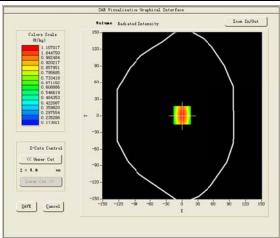
Test Date: September 29, 2016

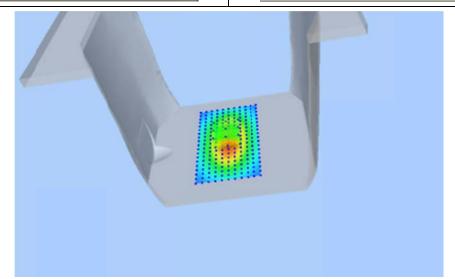
| Medium(liquid type) | MSL_900 |
|-----------------------------------|-----------|
| Frequency (MHz) | 835.0000 |
| Relative permittivity (real part) | 53.19 |
| Conductivity (S/m) | 0.93 |
| Input power | 100mW |
| Crest Factor | 1.0 |
| Conversion Factor | 5.04 |
| Variation (%) | 3.2700000 |
| SAR 10g (W/Kg) | 0.6307469 |
| SAR 1g (W/Kg) | 0.9760254 |

SURFACE SAR



VOLUME SAR





Test mode:1900MHz(Body) Product Description:Validation

Model:Dipole SID1900

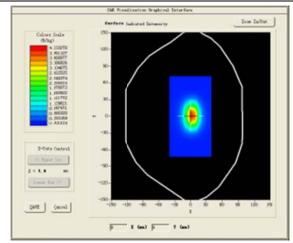
E-Field Probe: SSE5(SN17/14 EPG214)

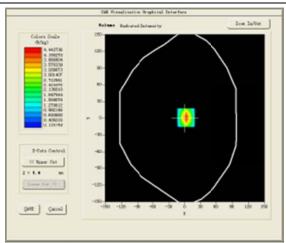
Test Date: September 29 2016

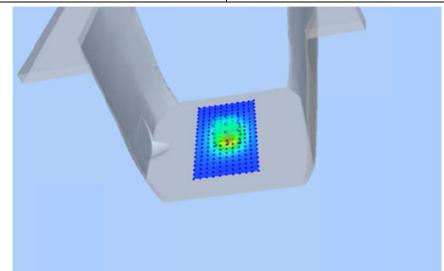
| Medium(liquid type) | MSL_1900 |
|-----------------------------------|------------|
| Frequency (MHz) | 1900.0000 |
| Relative permittivity (real part) | 54.31 |
| Conductivity (S/m) | 1.51 |
| Input power | 100mW |
| Crest Factor | 1.0 |
| Conversion Factor | 4.85 |
| Variation (%) | -1.6900000 |
| SAR 10g (W/Kg) | 2.1394137 |
| SAR 1g (W/Kg) | 4.3447231 |

SURFACE SAR

VOLUME SAR







4.12. SAR Test Graph Results

SAR plots for the highest measured SAR in each exposure configuration, wireless mode and frequency band combination according to FCC KDB 865664 D02 #1

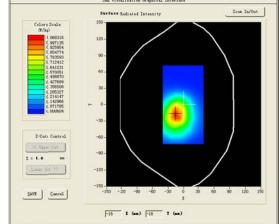
Test Mode: GSM850MHz,Mid channel(Body Rear Side)

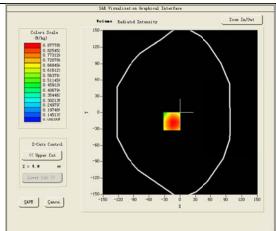
Product Description: Luggage Locator

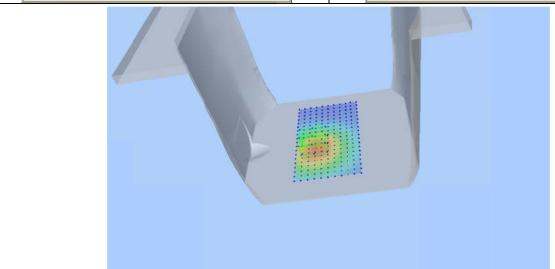
Model: LUGLOC002

Test Date: September 29, 2016

| Medium(liquid type) | MSL_900 | | |
|-----------------------------------|----------------------------|--|--|
| Frequency (MHz) | 836.600000 | | |
| Relative permittivity (real part) | 53.29 | | |
| Conductivity (S/m) | 0.94 | | |
| E-Field Probe | SN17/14 EPG214 | | |
| Crest Factor | 6.02 | | |
| Conversion Factor | 5.02 | | |
| Sensor | 4mm | | |
| Area Scan | dx=8mm dy=8mm | | |
| Zoom Scan | 5x5x7,dx=8mm dy=8mm dz=5mm | | |
| Variation (%) | 4.350000 | | |
| SAR 10g (W/Kg) | 0.577740 | | |
| SAR 1g (W/Kg) | 0.863421 | | |
| SURFACE SAR | VOLUME SAR | | |







#2

Test Mode: GPRS1900MHz, Mid channel (Body Rear Side)

Product Description: Luggage Locator

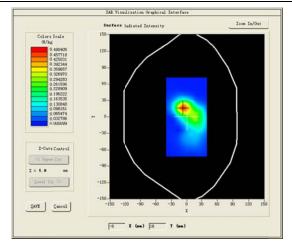
Model: LUGLOC002

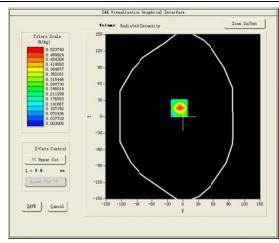
Test Date: September 29 2016

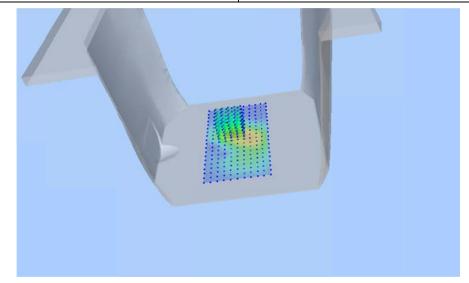
| Medium(liquid type) | MSL_1900 | | |
|-----------------------------------|----------------------------|--|--|
| Frequency (MHz) | 1880.000000 | | |
| Relative permittivity (real part) | 54.20 | | |
| Conductivity (S/m) | 1.54 | | |
| E-Field Probe | SN17/14 EP221 | | |
| Crest Factor | 4.06 | | |
| Conversion Factor | 4.85 | | |
| Sensor | 4mm | | |
| Area Scan | dx=8mm dy=8mm | | |
| Zoom Scan | 5x5x7,dx=8mm dy=8mm dz=5mm | | |
| Variation (%) | 1.210000 | | |
| SAR 10g (W/Kg) | 0.245448 | | |
| SAR 1g (W/Kg) | 0.483055 | | |
| CLIDEA CE CA D | VOLUME CAD | | |

SURFACE SAR

VOLUME SAR







5.CALIBRATION CERTIFICATES

5.1 Probe-EP214 Calibration Certificate



COMOSAR E-Field Probe Calibration Report

Ref: ACR.262.2.14.SATU.A

SHENZHEN LCS COMPLIANCE TESTING LABORATORY LTD.

1F., XINGYUAN INDUSTRIAL PARK, TONGDA ROAD, BAO'AN BLVD

BAO'AN DISTRICT, SHENZHEN, GUANGDONG, CHINA SATIMO COMOSAR DOSIMETRIC E-FIELD PROBE

SERIAL NO.: SN 17/14 EPG214

Calibrated at SATIMO US 2105 Barrett Park Dr. - Kennesaw, GA 30144





10/01/2015

Summary:

This document presents the method and results from an accredited COMOSAR Dosimetric E-Field Probe calibration performed in SATIMO USA using the CALISAR / CALIBAIR test bench, for use with a SATIMO COMOSAR system only. All calibration results are traceable to national metrology institutions.



Ref: ACR.262.2.14.SATU.A

| | Name | Function | Date | Signature |
|--------------|---------------|-----------------|------------|---------------|
| Prepared by: | Jérôme LUC | Product Manager | 10/14/2015 | JES |
| Checked by: | Jérôme LUC | Product Manager | 10/14/2015 | JES |
| Approved by: | Kim RUTKOWSKI | Quality Manager | 10/14/2015 | Jum Puthowski |

| | Customer Name | | |
|----------------|---|--|--|
| Distribution : | Shenzhen LCS Compliance Testing Laboratory Ltd. | | |

| Date | Modifications | |
|------------|--------------------|---|
| 10/14/2015 | Initial release | |
| | | |
| | | |
| | | |
| | DOLLAR DESCRIPTION | A DESCRIPTION OF THE PROPERTY |

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Ref: ACR.261.2.14.SATU.A

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Ref. ACR 261 2 14 SATU A

1 DEVICE UNDER TEST

| Device Under Test | | |
|--|----------------------------------|--|
| Device Type | COMOSAR DOSIMETRIC E FIELD PROBE | |
| Manufacturer | Satimo | |
| Model | SSE2 | |
| Serial Number | SN 17/14 EPG214 | |
| Product Condition (new / used) | New | |
| Frequency Range of Probe | 0.4 GHz- 6 GHz | |
| Resistance of Three Dipoles at Connector | Dipole 1: R1=0.212 MΩ | |
| | Dipole 2: R2=0.205 MΩ | |
| | Dipole 3: R3=0.227 MΩ | |

A yearly calibration interval is recommended.

2 PRODUCT DESCRIPTION

2.1 GENERAL INFORMATION

Satimo's COMOSAR E field Probes are built in accordance to the IEEE 1528, OET 65 Bulletin C and CEI/IEC 62209 standards.



Figure 1 - Satimo COMOSAR Dosimetric E field Dipole

| Probe Length | 330 mm |
|--|--------|
| Length of Individual Dipoles | 2 mm |
| Maximum external diameter | 8 mm |
| Probe Tip External Diameter | 2.5 mm |
| Distance between dipoles / probe extremity | 1 mm |

3 MEASUREMENT METHOD

The IEEE 1528, OET 65 Bulletin C, CENELEC EN50361 and CEI/IEC 62209 standards provide recommended practices for the probe calibrations, including the performance characteristics of interest and methods by which to assess their affect. All calibrations / measurements performed meet the fore mentioned standards.

3.1 LINEARITY

The evaluation of the linearity was done in free space using the waveguide, performing a power sweep to cover the SAR range 0.01W/kg to 100W/kg.

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3.2 SENSITIVITY

The sensitivity factors of the three dipoles were determined using a two step calibration method (air and tissue simulating liquid) using waveguides as outlined in the standards.

3.3 LOWER DETECTION LIMIT

The lower detection limit was assessed using the same measurement set up as used for the linearity measurement. The required lower detection limit is 10 mW/kg.

3.4 ISOTROPY

The axial isotropy was evaluated by exposing the probe to a reference wave from a standard dipole with the dipole mounted under the flat phantom in the test configuration suggested for system validations and checks. The probe was rotated along its main axis from 0 - 360 degrees in 15 degree steps. The hemispherical isotropy is determined by inserting the probe in a thin plastic box filled with tissue-equivalent liquid, with the plastic box illuminated with the fields from a half wave dipole. The dipole is rotated about its axis $(0^{\circ}-180^{\circ})$ in 15° increments. At each step the probe is rotated about its axis $(0^{\circ}-360^{\circ})$.

3.5 BOUNDARY EFFECT

The boundary effect is defined as the deviation between the SAR measured data and the expected exponential decay in the liquid when the probe is oriented normal to the interface. To evaluate this effect, the liquid filled flat phantom is exposed to fields from either a reference dipole or waveguide. With the probe normal to the phantom surface, the peak spatial average SAR is measured and compared to the analytical value at the surface.

4 MEASUREMENT UNCERTAINTY

The guidelines outlined in the IEEE 1528, OET 65 Bulletin C, CENELEC EN50361 and CEI/IEC 62209 standards were followed to generate the measurement uncertainty associated with an E-field probe calibration using the waveguide technique. All uncertainties listed below represent an expanded uncertainty expressed at approximately the 95% confidence level using a coverage factor of k=2, traceable to the Internationally Accepted Guides to Measurement Uncertainty.

| ERROR SOURCES | Uncertainty value (%) | Probability Distribution | Divisor | ci | Standard Uncertainty (%) |
|---------------------------|--------------------------|-----------------------------|------------|----|-----------------------------|
| Incident or forward power | 3.00% | Rectangular | √3 | 1 | 1.732% |
| Reflected power | 3.00% | Rectangular | $\sqrt{3}$ | 1 | 1.732% |
| Liquid conductivity | 5.00% | Rectangular | √3 | 1 | 2.887% |
| Liquid permittivity | 4.00% | Rectangular | $\sqrt{3}$ | 1 | 2.309% |
| Field homogeneity | 3.00% | Rectangular | $\sqrt{3}$ | 1 | 1.732% |
| Field probe positioning | 5.00% | Rectangular | $\sqrt{3}$ | 1 | 2.887% |
| Field probe linearity | 3.00% | Rectangular | $\sqrt{3}$ | 1 | 1.732% |

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| Combined standard uncertainty | 5.831% |
|--|--------|
| Expanded uncertainty 95 % confidence level k = 2 | 12.0% |

5 CALIBRATION MEASUREMENT RESULTS

| Calibration Parameters | | |
|------------------------|-------|--|
| Liquid Temperature | 21 °C | |
| Lab Temperature | 21 °C | |
| Lab Humidity | 45 % | |

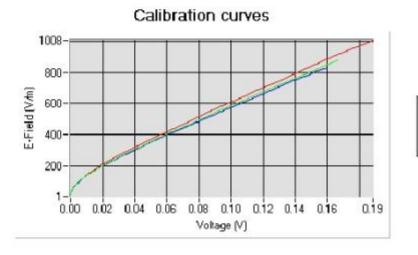
5.1 SENSITIVITY IN AIR

| Normx dipole $1 (\mu V/(V/m)^2)$ | | |
|----------------------------------|------|------|
| 0.75 | 0.57 | 0.62 |

| DCP dipole 1 | DCP dipole 2 | DCP dipole 3 |
|--------------|--------------|--------------|
| (mV) | (mV) | (mV) |
| 90 | 91 | 90 |

Calibration curves ei=f(V) (i=1,2,3) allow to obtain H-field value using the formula:

$$E = \sqrt{{E_1}^2 + {E_2}^2 + {E_3}^2}$$



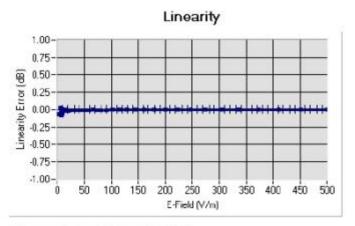


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5.2 LINEARITY



Linearity:II+/-1.92% (+/-0.08dB)

5.3 SENSITIVITY IN LIQUID

| Liquid | Frequency (MHz +/- 100MHz) | Permittivity | Epsilon (S/m) | ConvF |
|--------|----------------------------------|--------------|---------------|-------|
| HL450 | 450 | 43.90 | 0.87 | 23.53 |
| BL450 | 450 | 58.63 | 0.98 | 24.12 |
| HL750 | 750 | 42.06 | 0.89 | 17.62 |
| BL750 | 750 | 56.57 | 0.99 | 18.20 |
| HL850 | 835 | 42.81 | 0.89 | 18.79 |
| BL850 | 835 | 53.46 | 0.96 | 19.33 |
| HL900 | 900 | 42.47 | 0.96 | 18.13 |
| BL900 | 900 | 56.69 | 1.08 | 18.85 |
| HL1800 | 1800 | 41.31 | 1.38 | 18.52 |
| BL1800 | 1800 | 53.27 | 1.51 | 18.89 |
| HL1900 | 1900 | 41.09 | 1.42 | 20.93 |
| BL1900 | 1900 | 54.20 | 1.54 | 21.73 |
| HL2000 | 2000 | 39.72 | 1.43 | 19.85 |
| BL2000 | 2000 | 53.91 | 1.53 | 20.55 |
| HL2450 | 2450 | 39.05 | 1.77 | 20.46 |
| BL2450 | 2450 | 52.97 | 1.93 | 21.07 |
| HL2600 | 2600 | 38.35 | 1.92 | 21.01 |
| BL2600 | 2600 | 51.81 | 2.19 | 21.47 |
| HL5200 | 5200 | 36.62 | 4.93 | 16.88 |
| BL5200 | 5200 | 50.69 | 4.98 | 17.36 |
| HL5400 | 5400 | 35.95 | 5.18 | 19.08 |
| BL5400 | 5400 | 48.45 | 5.82 | 19.83 |
| HL5600 | 5600 | 36.08 | 5.60 | 18.13 |
| BL5600 | 5600 | 50.57 | 6.37 | 18.56 |
| HL5800 | 5800 | 34.73 | 5.74 | 16.24 |
| BL5800 | 5800 | 48.19 | 6.45 | 16.79 |

LOWER DETECTION LIMIT: 9mW/kg

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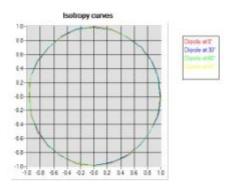


Ref: ACR.261.2.14.SATU.A

5.4 ISOTROPY

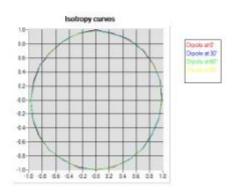
HL900 MHz

- Axial isotropy: 0.04 dB - Hemispherical isotropy: 0.07 dB



HL1800 MHz

- Axial isotropy: 0.04 dB - Hemispherical isotropy: 0.07 dB



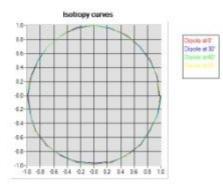
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HL5600 MHz

- Axial isotropy: 0.06 dB - Hemispherical isotropy: 0.09 dB



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6 LIST OF EQUIPMENT

| Equipment Summary Sheet | | | | |
|----------------------------------|-------------------------|--------------------|---|---|
| Equipment Description | Manufacturer / Model | Identification No. | Current Calibration Date | Next Calibration Date |
| Flat Phantom | Satimo | SN-20/09-SAM71 | Validated. No cal required. | Validated. No ca required. |
| COMOSAR Test Bench | Version 3 | NA | Validated. No cal required. | Validated. No ca required. |
| Network Analyzer | Rhode & Schwarz ZVA | SN100132 | 02/2013 | 02/2016 |
| Reference Probe | Satimo | EP 94 SN 37/08 | 10/2015 | 10/2016 |
| Multimeter | Keithley 2000 | 1188656 | 12/2013 | 12/2016 |
| Signal Generator | Agilent E4438C | MY49070581 | 12/2013 | 12/2016 |
| Amplifier | Aethercomm | SN 046 | Characterized prior to test. No cal required. | Characterized prior to test. No cal required. |
| Power Meter | HP E4418A | US38261498 | 12/2013 | 12/2016 |
| Power Sensor | HP ECP-E26A | US37181460 | 12/2013 | 12/2016 |
| Directional Coupler | Narda 4216-20 | 01386 | Characterized prior to test. No cal required. | Characterized prior to test. No cal required. |
| Waveguide | Mega Industries | 069Y7-158-13-712 | Validated. No cal required. | Validated. No cal required. |
| Waveguide Transition | Mega Industries | 069Y7-158-13-701 | Validated. No cal required. | Validated. No cal required. |
| Waveguide Termination | Mega Industries | 069Y7-158-13-701 | Validated. No cal required. | Validated. No cal required. |
| Temperature / Humidity Sensor | Control Company | 11-661-9 | 8/2013 | 8/2016 |

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5.2 SID835Dipole Calibration Ceriticate



SAR Reference Dipole Calibration Report

Ref: ACR.287.4.14.SATU.A

SHENZHEN LCS COMPLIANCE TESTING LABORATORY LTD.

1F., XINGYUAN INDUSTRIAL PARK, TONGDA ROAD, BAO'AN BLVD

BAO'AN DISTRICT, SHENZHEN, GUANGDONG, CHINA SATIMO COMOSAR REFERENCE DIPOLE

FREQUENCY: 835 MHZ

SERIAL NO.: SN 07/14 DIP 0G835-303

Calibrated at SATIMO US 2105 Barrett Park Dr. - Kennesaw, GA 30144





10/01/2015

Summary:

This document presents the method and results from an accredited SAR reference dipole calibration performed in SATIMO USA using the COMOSAR test bench. All calibration results are traceable to national metrology institutions.