

Report No. : SA190812C11

Applicant : Realtek Semiconductor Corp.

Address : No.2,Innovation Road II,Hsinchu Seience Park Hsinchu 300,Taiwan

Product : 802.11a/b/g/n/ac RTL8822CE Combo module

FCC ID : TX2-RTL8822CE

Brand : REALTEK

Model No. : RTL8822CE

Standards : FCC 47 CFR Part 2 (2.1093), IEEE C95.1:1992, IEEE Std 1528:2013

KDB 865664 D01 v01r04, KDB 865664 D02 v01r02

KDB 248227 D01 v02r02, KDB 447498 D01 v06, KDB 616217 D04 v01r02

Sample Received Date : Aug. 12, 2019

Date of Testing : Sep. 05, 2019

Lab Address : No. 47-2, 14th Ling, Chia Pau Vil., Lin Kou Dist., New Taipei City, Taiwan

Test Location : No. 19, Hwa Ya 2nd Rd., Wen Hwa Vil., Kwei Shan Dist., Taoyuan City, Taiwan

CERTIFICATION: The above equipment have been tested by **Bureau Veritas Consumer Products Services (H.K.) Ltd., Taoyuan Branch–Lin Kou Laboratories**, and found compliance with the requirement of the above standards. The test record, data evaluation & Equipment Under Test (EUT) configurations represented herein are true and accurate accounts of the measurements of the sample's SAR characteristics under the conditions specified in this report. It should not be reproduced except in full, without the written approval of our laboratory. The client should not use it to claim product certification, approval, or endorsement by TAF or any government agencies.

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Release Control Record

Report No.	Reason for Change	Date Issued
SA190812C11	Initial release	Sep. 23, 2019

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1. Summary of Maximum SAR Value

Equipment Class	Mode	Highest SAR-1g Body Tested at 0 mm (W/kg)
DTS	2.4G WLAN	0.94
	5.3G WLAN	1.10
NII	5.6G WLAN	<mark>1.19</mark>
	5.8G WLAN	1.13
DSS	Bluetooth	N/A

Highest Simultaneous Transmission SAR	Highest SAR-1g Body Tested at 0 mm (W/kg)
	1.36

Note:

1. The SAR criteria (Head & Body: SAR-1g1.6 W/kg, and Extremity: SAR-10g 4.0 W/kg) for general population/uncontrolled exposure is specified in FCC 47 CFR part 2 (2.1093) and ANSI/IEEE C95.1-1992.

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2. <u>Description of Equipment Under Test</u>

EUT Type	802.11a/b/g/n/ac RTL8822CE Combo module
FCC ID	TX2-RTL8822CE
Brand Name	REALTEK
Model Name	RTL8822CE
Tx Frequency Bands	WLAN: 2412 ~ 2472, 5180 ~ 5240, 5260 ~ 5320, 5500 ~ 5720,5745 ~ 5825
(Unit: MHz)	Bluetooth : 2402 ~ 2480
Uplink Modulations	802.11b : DSSS 802.11a/g/n/ac : OFDM Bluetooth : GFSK, π/4-DQPSK, 8-DPSK
Maximum Tune-up Conducted Power (Unit: dBm)	Please refer to section 4.6.1 of this report
Antenna Type	PIFA Antenna
EUT Stage	Engineering Sample

Note:

1. The EUT was installed in a specific End-product.

Ī	Equipment Name	Brand Name	Model Name	Difference
			Lenovo ThinkBook 15-IML	Test model
	Notebook Computer	Lenovo	20RW, Lenovo ThinkBook 15-I ******* ("*"= 0-9, A-Z, "/", or blank for Marketing purpose only)	Series model

2. The antenna information is listed as below.

			Antenna Gain			
Antenna Type	Manufacturer	Parts Number	BT / WLAN 2.4 GHz	WLAN 5.15~5.35 GHz	WLAN 5.47~5.725 GHz	WLAN 5.725~5.85 GHz
		TX1 Ant.:				
PIFA	Wistron Neweb	DQ6615G5000 (81EAA615.G50)	TX1: 0.68	TX1: 0.46	TX1: 0.79	TX1: 0.79
FIFA	Corporation	TX2 Ant.:	TX2: 0.60	TX2: -1.35	TX2: 0.05	TX2: 0.05
		DQ6615G5000 (81EAA615.G50)				

3. The above EUT information is declared by manufacturer and for more detailed features description please refers to the manufacturer's specifications or User's Manual.

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3. SAR Measurement System

3.1 Definition of Specific Absorption Rate (SAR)

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.

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 (ρ). The equation description is as below:

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

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

SAR measurement can be related to the electrical field in the tissue by

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

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

3.2 SPEAG DASY6 System

DASY6 system consists of high precision robot, probe alignment sensor, phantom, robot controller, controlled measurement server and near-field probe. The robot includes six axes that can move to the precision position of the DASY6 software defined. The DASY6 software can define the area that is detected by the probe. The robot is connected to controlled box. Controlled measurement server is connected to the controlled robot box. The DAE includes amplifier, signal multiplexing, AD converter, offset measurement and surface detection. It is connected to the Electro-optical coupler (ECO). The ECO performs the conversion form the optical into digital electric signal of the DAE and transfers data to the PC.

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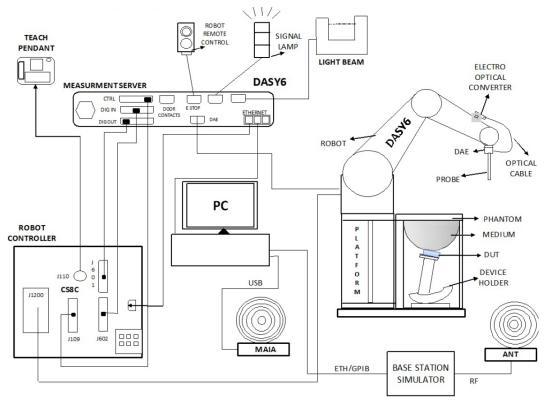


Fig-3.1 SPEAG DASY6 System Setup

3.2.1 Robot

The DASY6 systems use the high precision robots from Stäubli SA (France). For the 6-axis controller system, the robot controller version of CS8c from Stäubli is used. The Stäubli robot series have many features that are important for our application:

- High precision (repeatability ±0.035 mm)
- · High reliability (industrial design)
- · Jerk-free straight movements
- Low ELF interference (the closed metallic construction shields against motor control fields)



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3.2.2 Probes

The SAR measurement is conducted with the dosimetric probe. 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.

Model	EX3DV4	
Construction	Symmetrical design with triangular core. Built-in shielding against static charges. PEEK enclosure material (resistant to organic solvents, e.g., DGBE).	
Frequency	4 MHz to 10 GHz Linearity: ± 0.2 dB	
Directivity	± 0.1 dB in TSL (rotation around probe axis) ± 0.3 dB in TSL (rotation normal to probe axis)	
Dynamic Range	10 μW/g to 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	

3.2.3 Data Acquisition Electronics (DAE)

Model	DAE3, DAE4		
Construction	Signal amplifier, multiplexer, A/D converter and control logic. Serial optical link for communication with DASY embedded system (fully remote controlled). Two step probe touch detector for mechanical surface detection and emergency robot stop.		
Measurement	-100 to +300 mV (16 bit resolution and two range settings: 4mV,		
Range	400mV)	The last of the la	
Input Offset	< 5µV (with auto zero)		
Voltage	< Spv (with auto zero)		
Input Bias Current	< 50 fA		
Dimensions	60 x 60 x 68 mm		

3.2.4 Phantoms

Model	Twin SAM	
Construction	The shell corresponds to the specifications of the Specific Anthropomorphic Mannequin (SAM) phantom defined in IEEE 1528 and IEC 62209-1. It 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 evaporation of the liquid. Reference markings on the phantom allow the complete setup of all predefined phantom positions and measurement grids by teaching three points with the robot.	No.
Material Vinylester, glass fiber reinforced (VE-GF)		
Shell Thickness $2 \pm 0.2 \text{ mm } (6 \pm 0.2 \text{ mm at ear point})$		
Dimensions	Length: 1000 mm Width: 500 mm Height: adjustable feet	
Filling Volume	Filling Volume approx. 25 liters	

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Model	ELI	
Construction	Phantom for compliance testing of handheld and body-mounted wireless devices in the frequency range of 30 MHz to 6 GHz. ELI is fully compatible with the IEC 62209-2 standard and all known tissue simulating liquids. ELI has been optimized regarding its performance and can be integrated into our standard phantom tables. A cover prevents evaporation of the liquid. Reference markings on the phantom allow installation of the complete setup, including all predefined phantom positions and measurement grids, by teaching three points. The phantom is compatible with all SPEAG dosimetric probes and dipoles.	
Material	Vinylester, glass fiber reinforced (VE-GF)	
Shell Thickness	2.0 ± 0.2 mm (bottom plate)	
Dimensions	Major axis: 600 mm Minor axis: 400 mm	
Filling Volume	approx. 30 liters	



3.2.5 Device Holder

Model	Mounting Device
Construction	In combination with the Twin SAM Phantom or ELI4, the Mounting Device enables the rotation of the mounted transmitter device in spherical coordinates. Rotation point is the ear opening point. Transmitter devices can be easily and accurately positioned according to IEC, IEEE, FCC or other specifications. The device holder can be locked for positioning at different phantom sections (left head, right head, flat).
Material	POM



Model	Laptop Extensions Kit	
Construction	Simple but effective and easy-to-use extension for Mounting Device that facilitates the testing of larger devices according to IEC 62209-2 (e.g., laptops, cameras, etc.). It is lightweight and fits easily on the upper part of the Mounting Device in place of the phone positioner.	
Material	POM, Acrylic glass, Foam	



3.2.6 System Validation Dipoles

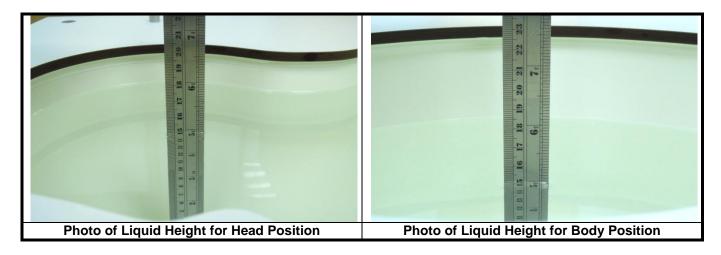
Model	D-Serial	
Construction	Symmetrical dipole with I/4 balun. Enables measurement of feedpoint impedance with NWA. Matched for use near flat phantoms filled with tissue simulating solutions.	
Frequency	750 MHz to 5800 MHz	
Return Loss	> 20 dB	
Power Capability	> 100 W (f < 1GHz),> 40 W (f > 1GHz)	

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3.2.7 Tissue Simulating Liquids

For SAR measurement of the field distribution inside the phantom, the phantom must be filled with homogeneous tissue simulating liquid to a depth of at least 15 cm. 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. For body SAR testing, the liquid height from the center of the flat phantom to the liquid top surface is larger than 15 cm. The nominal dielectric values of the tissue simulating liquids in the phantom and the tolerance of 5% are listed in Table-3.1.



The dielectric properties of the head tissue simulating liquids are defined in IEEE1528,and KDB 865664 D01 Appendix A. For the body tissue simulating liquids, the dielectric properties are defined in KDB 865664 D01 Appendix A. The dielectric properties of the tissue simulating liquids were verified prior to the SAR evaluation using a dielectric assessment kit and a network analyzer.

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Table-3.1Targets of Tissue Simulating Liquid

Frequency	Target	Range of	Target	Range of
(MHz)	Permittivity	±5%	Conductivity	±5%
		For Head		
750	41.9	39.8 ~ 44.0	0.89	0.85 ~ 0.93
835	41.5	39.4 ~ 43.6	0.90	0.86 ~ 0.95
900	41.5	39.4 ~ 43.6	0.97	0.92 ~ 1.02
1450	40.5	38.5 ~ 42.5	1.20	1.14 ~ 1.26
1640	40.3	38.3 ~ 42.3	1.29	1.23 ~ 1.35
1750	40.1	38.1 ~ 42.1	1.37	1.30 ~ 1.44
1800	40.0	38.0 ~ 42.0	1.40	1.33 ~ 1.47
1900	40.0	38.0 ~ 42.0	1.40	1.33 ~ 1.47
2000	40.0	38.0 ~ 42.0	1.40	1.33 ~ 1.47
2300	39.5	37.5 ~ 41.5	1.67	1.59 ~ 1.75
2450	39.2	37.2 ~ 41.2	1.80	1.71 ~ 1.89
2600	39.0	37.1 ~ 41.0	1.96	1.86 ~ 2.06
3500	37.9	36.0 ~ 39.8	2.91	2.76 ~ 3.06
5200	36.0	34.2 ~ 37.8	4.66	4.43 ~ 4.89
5300	35.9	34.1 ~ 37.7	4.76	4.52 ~ 5.00
5500	35.6	33.8 ~ 37.4	4.96	4.71 ~ 5.21
5600	35.5	33.7 ~ 37.3	5.07	4.82 ~ 5.32
5800	35.3	33.5 ~ 37.1	5.27	5.01 ~ 5.53
		For Body		
750	55.5	52.7 ~ 58.3	0.96	0.91 ~ 1.01
835	55.2	52.4 ~ 58.0	0.97	0.92 ~ 1.02
900	55.0	52.3 ~ 57.8	1.05	1.00 ~ 1.10
1450	54.0	51.3 ~ 56.7	1.30	1.24 ~ 1.37
1640	53.8	51.1 ~ 56.5	1.40	1.33 ~ 1.47
1750	53.4	50.7 ~ 56.1	1.49	1.42 ~ 1.56
1800	53.3	50.6 ~ 56.0	1.52	1.44 ~ 1.60
1900	53.3	50.6 ~ 56.0	1.52	1.44 ~ 1.60
2000	53.3	50.6 ~ 56.0	1.52	1.44 ~ 1.60
2300	52.9	50.3 ~ 55.5	1.81	1.72 ~ 1.90
2450	52.7	50.1 ~ 55.3	1.95	1.85 ~ 2.05
2600	52.5	49.9 ~ 55.1	2.16	2.05 ~ 2.27
3500	51.3	48.7 ~ 53.9	3.31	3.14 ~ 3.48
5200	49.0	46.6 ~ 51.5	5.30	5.04 ~ 5.57
5300	48.9	46.5 ~ 51.3	5.42	5.15 ~ 5.69
5500	48.6	46.2 ~ 51.0	5.65	5.37 ~ 5.93
5600	48.5	46.1 ~ 50.9	5.77	5.48 ~ 6.06
5800	48.2	45.8 ~ 50.6	6.00	5.70 ~ 6.30

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The following table gives the recipes for tissue simulating liquids.

Table-3.2Recipes of Tissue Simulating Liquid

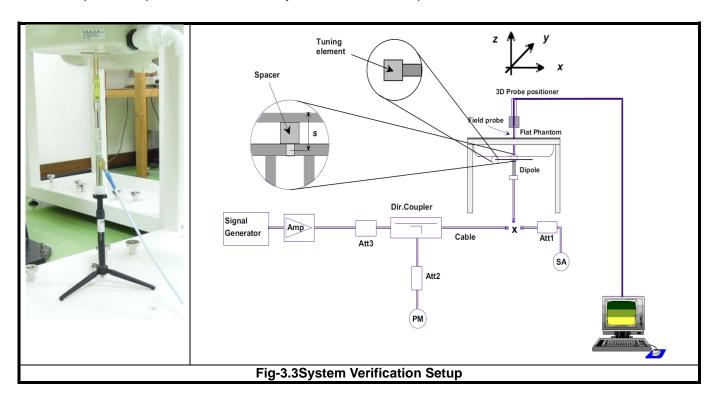
Tissue Type	Bactericide	DGBE	HEC	NaCl	Sucrose	Triton X-100	Water	Diethylene Glycol Mono- hexylether
H750	0.2	-	0.2	1.5	56.0	-	42.1	-
H835	0.2	-	0.2	1.5	57.0	-	41.1	-
H900	0.2	-	0.2	1.4	58.0	-	40.2	-
H1450	-	43.3	-	0.6	-	-	56.1	-
H1640	-	45.8	-	0.5	-	-	53.7	-
H1750	-	47.0	-	0.4	-	-	52.6	-
H1800	-	44.5	-	0.3	-	-	55.2	-
H1900	-	44.5	-	0.2	-	-	55.3	-
H2000	-	44.5	-	0.1	-	-	55.4	-
H2300	-	44.9		0.1	-	1	55.0	-
H2450	-	45.0	ı	0.1	-	1	54.9	-
H2600	-	45.1	-	0.1	-	-	54.8	-
H3500	-	8.0		0.2	-	20.0	71.8	-
H5G	-	-	-	-	-	17.2	65.5	17.3
B750	0.2	-	0.2	0.8	48.8	-	50.0	-
B835	0.2	-	0.2	0.9	48.5	-	50.2	-
B900	0.2	-	0.2	0.9	48.2	-	50.5	-
B1450	-	34.0	-	0.3	-	-	65.7	-
B1640	-	32.5	-	0.3	-	-	67.2	-
B1750	-	31.0	-	0.2	-	-	68.8	-
B1800	-	29.5	-	0.4	-	-	70.1	-
B1900	-	29.5	-	0.3	-	-	70.2	-
B2000	-	30.0	-	0.2	-	-	69.8	-
B2300	-	31.0		0.1	-	-	68.9	-
B2450	-	31.4	-	0.1	-	-	68.5	-
B2600	-	31.8	-	0.1	-	-	68.1	-
B3500	-	28.8	-	0.1	-	1	71.1	-
B5G	-	-	•	-	-	10.7	78.6	10.7

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3.3 SAR System Verification

The system check verifies that the system operates within its specifications. It is performed daily or before every SAR measurement. The system check uses normal SAR measurements in the flat section of the phantom with a matched dipole at a specified distance. The system verification setup is shown as below.



The validation dipole is placed beneath the flat phantom with the specific spacer in place. The distance spacer is touch the phantom surface with a light pressure at the reference marking and be oriented parallel to the long side of the phantom. The spectrum analyzer measures the forward power at the location of the system check dipole connector. The signal generator is adjusted for the desired forward power (250 mW is used for 700 MHz to 3 GHz, 100 mW is used for 3.5 GHz to 6 GHz) at the dipole connector and the power meter is read at that level. After connecting the cable to the dipole, the signal generator is readjusted for the same reading at power meter.

After system check testing, the SAR result will be normalized to 1W forward input power and compared with the reference SAR value derived from validation dipole certificate report. The deviation of system check should be within 10 %.

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3.4 SAR Measurement Procedure

According to the SAR 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

The SAR measurement procedures for each of test conditions are as follows:

- (a) Make EUT to transmit maximum output power
- (b) Measure conducted output power through RF cable
- (c) Place the EUT in the specific position of phantom
- (d) Perform SAR testing steps on the DASY system
- (e) Record the SAR value

3.4.1 Area & Zoom Scan Procedure

First Area Scan is used to locate the approximate location(s) of the local peak SAR value(s). The measurement grid within an Area Scan is defined by the grid extent, grid step size and grid offset. Next, in order to determine the EM field distribution in a three-dimensional spatial extension, Zoom Scan is required. The Zoom Scan is performed around the highest E-field value to determine the averaged SAR-distribution over 10 g. According to KDB 865664D01, the resolution for Area and Zoom scan is specified in the table below.

Items	<= 2 GHz	2-3 GHz	3-4 GHz	4-5 GHz	5-6 GHz
Area Scan (Δx, Δy)	<= 15 mm	<= 12 mm	<= 12 mm	<= 10 mm	<= 10 mm
Zoom Scan (Δx, Δy)	<= 8 mm	<= 5 mm	<= 5 mm	<= 4 mm	<= 4 mm
Zoom Scan (Δz)	<= 5 mm	<= 5 mm	<= 4 mm	<= 3 mm	<= 2 mm
Zoom Scan Volume	>= 30 mm	>= 30 mm	>= 28 mm	>= 25 mm	>= 22 mm

Note:

When zoom scan is required and report SAR is <=1.4 W/kg, the zoom scan resolution of $\Delta x / \Delta y$ (2-3GHz: <= 8 mm, 3-4GHz: <= 7 mm, 4-6GHz: <= 5 mm) may be applied.

3.4.2 Volume Scan Procedure

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.

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3.4.3 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 drift more than 5%, the SAR will be retested.

3.4.4 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

3.4.5 SAR Averaged Methods

In DASY, the interpolation and extrapolation are both based on the modified Quadratic Shepard's method. The interpolation scheme combines a least-square fitted function method and a weighted average method which are the two basic types of computational interpolation and approximation.

Extrapolation routines are used to obtain SAR values between the lowest measurement points and the inner phantom surface. The extrapolation distance is determined by the surface detection distance and the probe sensor offset. The uncertainty increases with the extrapolation distance. To keep the uncertainty within 1% for the 1 g and 10 g cubes, the extrapolation distance should not be larger than 5 mm.

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4. SAR Measurement Evaluation

4.1 EUT Configuration and Setting

<Considerations Related to WLAN for Setup and Testing>

In general, various vendor specific external test software and chipset based internal test modes are typically used for SAR measurement. These chipset based test mode utilities are generally hardware and manufacturer dependent, and often include substantial flexibility to reconfigure or reprogram a device. A Wi-Fi device must be configured to transmit continuously at the required data rate, channel bandwidth and signal modulation, using the highest transmission duty factor supported by the test mode tools for SAR measurement. The test frequencies established using test mode must correspond to the actual channel frequencies. When 802.11 frame gaps are accounted for in the transmission, a maximum transmission duty factor of 92 - 96% is typically achievable in most test mode configurations. A minimum transmission duty factor of 85% is required to avoid certain hardware and device implementation issues related to wide range SAR scaling. In addition, a periodic transmission duty factor is required for current generation SAR systems to measure SAR correctly. The reported SAR must be scaled to 100% transmission duty factor to determine compliance at the maximum tune-up tolerance limit.

According to KDB 248227 D01,this device has installed WLAN engineering testing software which can provide continuous transmitting RF signal. During WLAN SAR testing, this device was operated to transmit continuously at the maximum transmission duty with specified transmission mode, operating frequency, lowest data rate, and maximum output power.

Initial Test Configuration

An initial test configuration is determined for OFDM transmission modes in 2.4 GHz and 5 GHz bands according to the channel bandwidth, modulation and data rate combination(s) with the highest maximum output power specified for production units in each standalone and aggregated frequency band. When the same maximum power is specified for multiple transmission modes in a frequency band, the largest channel bandwidth, lowest order modulation, lowest data rate and lowest order 802.11a/g/n/ac mode is used for SAR measurement, on the highest measured output power channel in the initial test configuration, for each frequency band.

Subsequent Test Configuration

SAR measurement requirements for the remaining 802.11 transmission mode configurations that have not been tested in the initial test configuration are determined separately for each standalone and aggregated frequency band, in each exposure condition, according to the maximum output power specified for production units. Additional power measurements may be required to determine if SAR measurements are required for subsequent highest output power channels in a subsequent test configuration. When the highest reported SAR for the initial test configuration according to the initial test position or fixed exposure position requirements, is adjusted by the ratio of the subsequent test configuration to initial test configuration specified maximum output power and the adjusted SAR is ≤ 1.2 W/kg, SAR is not required for that subsequent test configuration.

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SAR Test Configuration and Channel Selection

When multiple channel bandwidth configurations in a frequency band have the same specified maximum output power, the initial test configuration is using largest channel bandwidth, lowest order modulation, lowest data rate, and lowest order 802.11 mode (i.e., 802.11a is chosen over 802.11n then 802.11ac or 802.11g is chosen over 802.11n). After an initial test configuration is determined, if multiple test channels have the same measured maximum output power, the channel chosen for SAR measurement is determined according to the following.

- 1) The channel closest to mid-band frequency is selected for SAR measurement.
- 2) For channels with equal separation from mid-band frequency; for example, high and low channels or two mid-band channels, the higher frequency (number) channel is selected for SAR measurement.

Test Reduction for U-NII-1 (5.2 GHz) and U-NII-2A (5.3 GHz) Bands

For devices that operate in both U-NII bands using the same transmitter and antenna(s), SAR test reduction is determined according to the following.

- 1) When the same maximum output power is specified for both bands, begin SAR measurement in U-NII-2A band by applying the OFDM SAR requirements. If the highest reported SAR for a test configuration is ≤ 1.2 W/kg, SAR is not required for U-NII-1 band for that configuration (802.11 mode and exposure condition).
- 2) When different maximum output power is specified for the bands, begin SAR measurement in the band with higher specified maximum output power. The highest reported SAR for the tested configuration is adjusted by the ratio of lower to higher specified maximum output power for the two bands. When the adjusted SAR is $\leq 1.2 \text{ W/kg}$, SAR is not required for the band with lower maximum output power in that test configuration.

4.2 EUT Testing Position

4.2.1 Body Exposure Conditions

For laptop PC, according to KDB 616217 D04, SAR evaluation is required for the bottom surface of the keyboard. This EUT was tested in the base of EUT directly against the flat phantom. The required minimum test separation distance for incorporating transmitters and antennas into laptop computer display is determined with the display screen opened at an angle of 90° to the keyboard compartment.

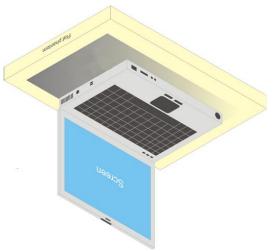


Fig-4.1 Illustration for Laptop Setup

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4.2.2 SAR Test Exclusion Evaluations

According to KDB 447498 D01, the SAR test exclusion condition is based on source-based time-averaged maximum conducted output power, adjusted for tune-up tolerance, and the minimum test separation distance required for the exposure conditions. The SAR exclusion threshold is determined by the following formula.

1. For the test separation distance <= 50 mm

$$\frac{\text{Max. Tune up Power}_{(mW)}}{\text{Min. Test Separation Distance}_{(mm)}} \times \sqrt{f_{(GHz)}} \leq 3.0 \text{ for SAR-1g,} \leq 7.5 \text{ for SAR-10g}$$

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

2. For the test separation distance > 50 mm, and the frequency at 100 MHz to 1500 MHz

$$\left[\text{(Threshold at 50 mm in Step 1)} + \text{(Test Separation Distance} - 50 \text{ mm)} \times \left(\frac{f_{\text{(MHz)}}}{150} \right) \right]_{\text{(mW)}}$$

3. For the test separation distance > 50 mm, and the frequency at > 1500 MHz to 6 GHz $[(Threshold at 50 mm in Step 1) + (Test Separation Distance - 50 mm) \times 10]_{(mW)}$

	Max.	Max.	Bottom Side			
Mode	Tune-up Power (dBm)	Tune-up Power (mW)	Ant. to Surface (mm)	Calculated Result	Require SAR Testing?	
ВТ	6	4	15	0.42	No	

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4.3 Tissue Verification

The measuring results for tissue simulating liquid are shown as below.

Test Date	Frequency (MHz)	Liquid Temp. (℃)	Measured Conductivity (σ)	Measured Permittivity (ϵ_r)	Target Conductivity (σ)	Target Permittivity (ε _r)	Conductivity Deviation (%)	Permittivity Deviation (%)
Sep. 05, 2019	2450	23.3	1.873	38.701	1.8	39.2	4.06	-1.27
Sep. 05, 2019	5250	23.3	4.529	34.481	4.71	35.9	-3.84	-3.95
Sep. 05, 2019	5600	23.3	4.871	33.999	5.07	35.5	-3.93	-4.23
Sep. 05, 2019	5750	23.3	5.022	33.784	5.22	35.4	-3.79	-4.56

Note:

The dielectric properties of the tissue simulating liquid must be measured within 24 hours before the SAR testing and within $\pm 5\%$ of the target values. Liquid temperature during the SAR testing must be within ± 2 °C.

4.4 System Validation

The SAR measurement system was validated according to procedures in KDB 865664 D01. The validation status in tabulated summary is as below.

Tool	Doobo	Calibration	Measured	Measured	Va	lidation for C	:W	Valida	tion for Modu	lation
Test Date	Probe S/N	Calibration Point	Conductivity (σ)	Permittivity (ε _r)	Sensitivity Range	Probe Linearity	Probe Isotropy	Modulation Type	Duty Factor	PAR
Sep. 05, 2019	3898	2450	1.873	38.701	Pass	Pass	Pass	OFDM	N/A	Pass
Sep. 05, 2019	3898	5250	4.529	34.481	Pass	Pass	Pass	OFDM	N/A	Pass
Sep. 05, 2019	3898	5600	4.871	33.999	Pass	Pass	Pass	OFDM	N/A	Pass
Sep. 05, 2019	3898	5750	5.022	33.784	Pass	Pass	Pass	OFDM	N/A	Pass

4.5 System Verification

The measuring result for system verification is tabulated as below.

Test Date	Frequency (MHz)	1W Target SAR-1g (W/kg)	Measured SAR-1g (W/kg)	Normalized to 1W SAR-1g (W/kg)	Deviation (%)	Dipole S/N	Probe S/N	DAE S/N
Sep. 05, 2019	2450	53.10	13.30	53.20	0.19	835	3898	916
Sep. 05, 2019	5250	80.70	7.67	76.70	-4.96	1019	3898	916
Sep. 05, 2019	5600	85.80	8.18	81.80	-4.66	1019	3898	916
Sep. 05, 2019	5750	81.50	7.91	79.10	-2.94	1019	3898	916

Note:

Comparing to the reference SAR value provided by SPEAG, the validation data should be within its specification of 10 %. The result indicates the system check can meet the variation criterion and the plots can be referred to Appendix A of this report.

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4.6 Maximum Output Power

4.6.1 Maximum Target Conducted Power

The maximum conducted average power (Unit: dBm) including tune-up tolerance is shown as below.

<WLAN 2.4G>

Mode	Channel	Frequency (MHz)	Tune-up Power (TX1)	Tune-up Power (TX2)	Tune-up Power (TX1+TX2)
	1	2412	19.0	19.0	-
	6	2437	20.0	20.0	-
802.11b	11	2462	19.0	19.0	-
	12	2467	14.0	14.0	-
	13	2472	13.0	13.0	-
	1	2412	14.0	14.0	17.0
	6	2437	20.0	20.0	23.0
802.11g	11	2462	14.0	14.0	17.0
	12	2467	11.0	11.0	14.0
	13	2472	8.0	8.0	11.0
	1	2412	14.0	14.0	17.0
	6	2437	20.0	20.0	23.0
802.11n (HT20)	11	2462	14.0	14.0	17.0
	12	2467	11.0	11.0	14.0
	13	2472	8.0	8.0	11.0
	3	2422	14.0	14.0	16.0
	6	2437	17.0	17.0	20.0
802.11n (HT40)	9	2452	14.0	14.0	17.0
	10	2457	11.0	11.0	14.0
	11	2462	8.0	8.0	10.5
	1	2412	14.0	14.0	17.0
	6	2437	20.0	20.0	23.0
802.11ac (VHT20)	11	2462	14.0	14.0	17.0
	12	2467	11.0	11.0	14.0
	13	2472	8.0	8.0	11.0
	3	2422	14.0	14.0	16.0
	6	2437	17.0	17.0	20.0
802.11ac (VHT40)	9	2452	14.0	14.0	17.0
	10	2457	11.0	11.0	14.0
	11	2462	8.0	8.0	10.5

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<WLAN 5.2G>

Mode	Channel	Frequency (MHz)	Tune-up Power (TX1)	Tune-up Power (TX2)	Tune-up Power (TX1+TX2)
	36	5180	19.5	19.5	21.5
802.11a	40	5200	20.5	20.5	21.5
002.11a	44	5220	20.5	20.5	21.5
	48	5240	20.5	20.5	21.5
	36	5180	19.5	19.5	21.5
802.11n (HT20)	40	5200	20.5	20.5	21.5
002.1111 (П120)	44	5220	20.5	20.5	21.5
	48	5240	20.5	20.5	21.5
002 44m (UT40)	38	5190	18.0	18.0	19.5
802.11n (HT40)	46	5230	19.5	19.5	21.5
	36	5180	19.5	19.5	21.5
902 44 as (VUT20)	40	5200	20.5	20.5	21.5
802.11ac (VHT20)	44	5220	20.5	20.5	21.5
	48	5240	20.5	20.5	21.5
902 11aa (\/UT40\	38	5190	18.0	18.0	19.5
802.11ac (VHT40)	46	5230	19.5	19.5	21.5
802.11ac (VHT80)	42	5210	17.5	17.5	18.0

<WLAN 5.3G>

Mode	Channel	Frequency (MHz)	Tune-up Power (TX1)	Tune-up Power (TX2)	Tune-up Power (TX1+TX2)
	52	5260	20.0	20.5	21.5
802.11a	56	5280	20.5	20.5	21.5
002.11a	60	5300	20.5	20.5	21.0
	64	5320	20.0	20.0	21.5
	52	5260	20.5	20.5	21.5
802.11n (HT20)	56	5280	20.5	20.5	21.5
002.1111 (П120)	60	5300	20.5	20.5	21.0
	64	5320	20.0	20.0	21.5
802.11n (HT40)	54	5270	19.5	19.5	21.5
002.1111 (П140)	62	5310	17.5	17.5	19.0
	52	5260	20.5	20.5	21.5
902 44 co (\/UT20\	56	5280	20.5	20.5	21.5
802.11ac (VHT20)	60	5300	20.5	20.5	21.0
	64	5320	20.0	20.0	21.5
902 44ee (\/UT40\	54	5270	19.5	19.5	21.5
802.11ac (VHT40)	62	5310	17.5	17.5	19.0
802.11ac (VHT80)	58	5290	17.0	17.0	17.5

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<WLAN 5.6G>

Mode	Channel	Frequency (MHz)	Tune-up Power (TX1)	Tune-up Power (TX2)	Tune-up Power (TX1+TX2)
	100	5500	19.0	19.0	19.5
	116	5580	20.0	20.0	21.5
	120	5600	20.0	20.0	21.5
802.11a	124	5620	20.0	20.0	21.5
	132	5660	20.0	20.0	21.5
	140	5700	19.0	19.0	19.5
	144	5720	20.0	20.0	21.5
	100	5500	19.0	19.0	19.5
	116	5580	20.0	20.0	21.5
	120	5600	20.0	20.0	21.5
802.11n (HT20)	124	5620	20.0	20.0	21.5
	132	5660	20.0	20.0	21.5
	140	5700	19.0	19.0	19.5
	144	5720	20.0	20.0	21.5
	102	5510	16.0	16.0	18.0
	110	5550	19.5	19.5	21.5
802.11n (HT40)	118	5590	19.5	19.5	21.5
002.1111 (11140)	126	5630	19.5	19.5	21.5
_	134	5670	19.5	19.5	21.5
	142	5710	19.5	19.5	21.5
	100	5500	19.0	19.0	19.5
	116	5580	20.0	20.0	21.5
	120	5600	20.0	20.0	21.5
802.11ac (VHT20)	124	5620	20.0	20.0	21.5
	132	5660	20.0	20.0	21.5
	140	5700	19.0	19.0	19.5
	144	5720	20.0	20.0	21.5
	102	5510	16.0	16.0	18.0
	110	5550	19.5	19.5	21.5
802.11ac (VHT40)	118	5590	19.5	19.5	21.5
002.11ac (VI1140)	126	5630	19.5	19.5	21.5
	134	5670	19.5	19.5	21.5
	142	5710	19.5	19.5	21.5
	106	5530	16.0	16.0	17.0
802.11ac (VHT80)	122	5610	19.5	19.5	21.0
	138	5690	19.5	19.5	21.5

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<WLAN 5.8G>

Mode	Channel	Frequency (MHz)	Tune-up Power (TX1)	Tune-up Power (TX2)	Tune-up Power (TX1+TX2)
	149	5745	20.5	20.5	23.5
	153	5765	20.5	20.5	23.5
802.11a	157	5785	20.5	20.5	23.5
	161	5805	20.5	20.5	23.5
	165	5825	20.5	20.5	23.5
	149	5745	20.5	20.5	23.5
	153	5765	20.5	20.5	23.5
802.11n (HT20)	157	5785	20.5	20.5	23.5
	161	5805	20.5	20.5	23.5
	165	5825	20.5	20.5	23.5
000 44n (UT40)	151	5755	19.5	19.5	22.5
802.11n (HT40)	159	5795	19.5	19.5	22.5
	149	5745	20.5	20.5	23.5
	153	5765	20.5	20.5	23.5
802.11ac (VHT20)	157	5785	20.5	20.5	23.5
	161	5805	20.5	20.5	23.5
	165	5825	20.5	20.5	23.5
902 44 ap (\/UT40\	151	5755	19.5	19.5	22.5
802.11ac (VHT40)	159	5795	19.5	19.5	22.5
802.11ac (VHT80)	155	5775	19.5	19.5	20.0

<Bluetooth>

Mode	Channel	Frequency (MHz)	Tune-up Power
	0	2402	6.0
Bluetooth EDR	39	2441	6.0
	78	2480	6.0
	0	2402	6.0
Bluetooth LE	19	2440	6.0
	39	2480	6.0

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4.6.2 Measured Conducted Power Result

The measuring conducted average power (Unit: dBm) is shown as below.

<WLAN 2.4G>

Mode	Channel	Frequency (MHz)	Average Power (TX1)	Average Power (TX2)	Average Power (TX1+TX2)
	1	2412	18.91	18.85	-
	6	2437	19.93	19.89	-
802.11b	11	2462	18.94	18.88	-
	12	2467	13.98	13.89	-
	13	2472	12.95	12.88	-
	1	2412	-	-	16.89
	6	2437	-	-	22.89
802.11g	11	2462	-	-	16.91
_	12	2467	-	-	13.92
	13	2472	-	-	10.94

<WLAN 5.3G>

Mode	Channel	Frequency (MHz)	Average Power (TX1)	Average Power (TX2)	Average Power (TX1+TX2)
	52	5260	19.91	20.43	-
802.11a	56	5280	20.44	20.38	-
002.11d	60	5300	20.45	20.40	-
	64	5320	19.93	19.89	-
802.11n (HT40)	54	5270	-	-	21.41
ου 2.1111 (Π14 0)	62	5310	-	-	18.94

<WLAN 5.6G>

Mode	Channel	Frequency (MHz)	Average Power (TX1)	Average Power (TX2)	Average Power (TX1+TX2)
	100	5500	18.98	18.91	-
	116	5580	19.81	19.79	-
	120	5600	19.78	19.77	-
802.11a	124	5620	19.76	19.76	-
	132	5660	19.71	19.74	-
	140	5700	18.93	18.89	-
	144	5720	19.72	19.71	-
	106	5530	-	-	16.97
802.11ac (VHT80)	122	5610	-	•	20.97
	138	5690	-	-	21.17

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<WLAN 5.8G>

Mode	Channel	Frequency (MHz)	Average Power (TX1)	Average Power (TX2)	Average Power (TX1+TX2)
	149	5745	20.47	20.39	23.46
	153	5765	20.45	20.41	23.41
802.11a	157	5785	20.44	20.37	23.40
	161	5805	20.46	20.41	23.40
	165	5825	20.41	20.35	23.42

<Bluetooth>

Mode	Channel	Frequency (MHz)	Average Power
	0	2402	5.11
Bluetooth EDR	39	2441	5.09
	78	2480	5.15
	0	2402	5.11
Bluetooth LE	19	2440	5.15
	39	2480	5.14

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4.7 SAR Testing Results

4.7.1 SAR Test Reduction Considerations

<KDB 447498 D01, General RF Exposure Guidance>

Testing of other required channels within the operating mode of a frequency band is not required when the reported SAR for the mid-band or highest output power channel is:

- (1) ≤ 0.8 W/kg or 2.0 W/kg, for 1-g or 10-g respectively, when the transmission band is ≤ 100 MHz
- (2) ≤ 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
- (3) ≤ 0.4 W/kg or 1.0 W/kg, for 1-g or 10-g respectively, when the transmission band is ≥ 200 MHz

When SAR is not measured at the maximum power level allowed for production units, the measured SAR will be scaled to the maximum tune-up tolerance limit to determine compliance. The scaling factor for the tune-up power is defined as maximum tune-up limit (mW) / measured conducted power (mW). The reported SAR would be calculated by measured SAR x tune-up power scaling factor.

The SAR has been measured with highest transmission duty factor supported by the test mode tools for WLAN and/or Bluetooth. When the transmission duty factor could not achieve 100%, the reported SAR will be scaled to 100% transmission duty factor to determine compliance at the maximum tune-up power. The scaling factor for the duty factor is defined as 100% / transmission duty cycle (%). The reported SAR would be calculated by measured SAR x tune-up power scaling factor x duty cycle scaling factor.

<KDB 248227 D01, SAR Guidance for Wi-Fi Transmitters>

- (1) For handsets operating next to ear, hotspot mode or mini-tablet configurations, the initial test position procedures were applied. The test position with the highest extrapolated peak SAR will be used as the initial test position. When the reported SAR of initial test position is <= 0.4 W/kg, SAR testing for remaining test positions is not required. Otherwise, SAR is evaluated at the subsequent highest peak SAR positions until the reported SAR result is <= 0.8 W/kg or all test positions are measured.
- (2) For WLAN 2.4 GHz, the highest measured maximum output power channel for DSSS was selected for SAR measurement. When the reported SAR is <= 0.8 W/kg, no further SAR testing is required. Otherwise, SAR is evaluated at the next highest measured output power channel. When any reported SAR is >1.2 W/kg, SAR is required for the third channel. For OFDM modes (802.11g/n),SAR is not required when the highest reported SAR for DSSS is adjusted by the ratio of OFDM to DSSS specified maximum output power and it is <= 1.2 W/kg.
- (3) For WLAN 5GHz, the initial test configuration was selected according to the transmission mode with the highest maximum output power. When the reported SAR of initial test configuration is > 0.8 W/kg, SAR is required for the subsequent highest measured output power channel until the reported SAR result is <=1.2 W/kg or all required channels are measured. For other transmission modes, SAR is not required when the highest reported SAR for initial test configuration is adjusted by the ratio of subsequent test configuration to initial test configuration specified maximum output power and it is <= 1.2 W/kg.

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4.7.2 SAR Results for Body Exposure Condition (Test Separation Distance is 0 mm)

Plot No.	Band	Mode	Test Position	Ch.	Ant. Status	Duty Cycle	Crest Factor	Max. Tune-up Power (dBm)	Measured Conducted Power (dBm)	Scaling Factor	Power Drift (dB)	Measured SAR-1g (W/kg)	Scaled SAR-1g (W/kg)
01	WLAN2.4G	802.11b	Bottom	6	TX1	100.00	1.00	20.0	19.93	1.02	-0.06	0.921	<mark>0.94</mark>
	WLAN2.4G	802.11b	Bottom	6	TX2	100.00	1.00	20.0	19.89	1.03	-0.01	0.758	0.78
	WLAN2.4G	802.11g	Bottom	6	TX1+2	100.00	1.00	23.0	22.89	1.03	0.03	0.704	0.73
	WLAN2.4G	802.11b	Bottom	1	TX1	100.00	1.00	19.0	18.91	1.02	0.05	0.614	0.63
	WLAN2.4G	802.11b	Bottom	11	TX1	100.00	1.00	19.0	18.94	1.01	-0.09	0.634	0.64
	WLAN2.4G	802.11b	Bottom	12	TX1	100.00	1.00	14.0	13.98	1.00	0.03	0.202	0.20
	WLAN2.4G	802.11b	Bottom	13	TX1	100.00	1.00	13.0	12.95	1.01	-0.11	0.148	0.15
	WLAN2.4G	802.11b	Bottom	6	TX1	100.00	1.00	20.0	19.93	1.02	-0.01	0.913	0.93
	WLAN5.3G	802.11a	Bottom	60	TX1	100.00	1.00	20.5	20.45	1.01	-0.14	0.917	0.93
	WLAN5.3G	802.11a	Bottom	52	TX2	100.00	1.00	20.5	20.43	1.02	-0.04	0.881	0.90
	WLAN5.3G	802.11n HT40	Bottom	54	TX1+2	100.00	1.00	21.5	21.41	1.02	0.04	0.728	0.74
02	WLAN5.3G	802.11a	Bottom	52	TX1	100.00	1.00	20.0	19.91	1.02	-0.14	1.08	1.10
	WLAN5.3G	802.11a	Bottom	56	TX1	100.00	1.00	20.5	20.44	1.01	0.06	0.998	1.01
	WLAN5.3G	802.11a	Bottom	64	TX1	100.00	1.00	20.0	19.93	1.02	-0.02	0.662	0.68
	WLAN5.3G	802.11a	Bottom	56	TX2	100.00	1.00	20.5	20.38	1.03	-0.04	0.825	0.85
	WLAN5.3G	802.11a	Bottom	60	TX2	100.00	1.00	20.5	20.4	1.02	0.08	0.648	0.66
	WLAN5.3G	802.11a	Bottom	64	TX2	100.00	1.00	20.0	19.89	1.03	-0.18	0.481	0.50
	WLAN5.3G	802.11a	Bottom	52	TX1	100.00	1.00	20.0	19.91	1.02	0.01	1.06	1.08
	WLAN5.6G	802.11a	Bottom	116	TX1	100.00	1.00	20.0	19.81	1.04	-0.14	0.524	0.54
	WLAN5.6G	802.11a	Bottom	116	TX2	100.00	1.00	20.0	19.79	1.05	0.12	0.393	0.41
	WLAN5.6G	802.11ac VHT80	Bottom	138	TX1+2	100.00	1.00	21.5	21.17	1.08	-0.11	0.498	0.54
	WLAN5.6G	802.11a	Bottom	100	TX1	100.00	1.00	19.0	18.98	1.00	-0.10	0.772	0.77
	WLAN5.6G	802.11a	Bottom	120	TX1	100.00	1.00	20.0	19.78	1.05	0.03	0.627	0.66
	WLAN5.6G	802.11a	Bottom	124	TX1	100.00	1.00	20.0	19.76	1.06	0.03	0.717	0.76
03	WLAN5.6G	802.11a	Bottom	132	TX1	100.00	1.00	20.0	19.71	1.07	-0.05	1.11	<mark>1.19</mark>
	WLAN5.6G	802.11a	Bottom	140	TX1	100.00	1.00	19.0	18.93	1.02	-0.08	0.575	0.59
	WLAN5.6G	802.11a	Bottom	144	TX1	100.00	1.00	20.0	19.72	1.07	-0.01	0.752	0.80
	WLAN5.6G	802.11a	Bottom	132	TX1	100.00	1.00	20.0	19.71	1.07	-0.05	1.09	1.17
04	WLAN5.8G	802.11a	Bottom	149	TX1	100.00	1.00	20.5	20.47	1.01	-0.15	1.12	<mark>1.13</mark>
	WLAN5.8G	802.11a	Bottom	153	TX2	100.00	1.00	20.5	20.41	1.02	0.06	0.258	0.26
	WLAN5.8G	802.11a	Bottom	149	TX1+2	100.00	1.00	23.5	23.46	1.01	0.06	0.969	0.98
	WLAN5.8G	802.11a	Bottom	153	TX1	100.00	1.00	20.5	20.45	1.01	0.08	1.07	1.08
	WLAN5.8G	802.11a	Bottom	157	TX1	100.00	1.00	20.5	20.44	1.01	-0.13	1.06	1.07
	WLAN5.8G	802.11a	Bottom	161	TX1	100.00	1.00	20.5	20.46	1.01	-0.16	1.09	1.10
	WLAN5.8G	802.11a	Bottom	165	TX1	100.00	1.00	20.5	20.41	1.02	0.16	1.09	1.11
	WLAN5.8G	802.11a	Bottom	153	TX1+2	100.00	1.00	23.5	23.41	1.02	0.07	0.951	0.97
	WLAN5.8G	802.11a	Bottom	157	TX1+2	100.00	1.00	23.5	23.40	1.02	0.16	0.962	0.98
	WLAN5.8G	802.11a	Bottom	161	TX1+2	100.00	1.00	23.5	23.40	1.02	0.12	0.943	0.96
	WLAN5.8G	802.11a	Bottom	165	TX1+2	100.00	1.00	23.5	23.42	1.02	0.03	0.926	0.94
	WLAN5.8G	802.11a	Bottom	149	TX1	100.00	1.00	20.5	20.47	1.01	-0.15	1.1	1.11

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4.7.3 SAR Measurement Variability

According to KDB 865664 D01, SAR measurement variability was assessed for each frequency band, which is determined by the SAR probe calibration point and tissue-equivalent medium used for the device measurements. When both head and body tissue-equivalent media are required for SAR measurements in a frequency band, the variability measurement procedures should be applied to the tissue medium with the highest measured SAR, using the highest measured SAR configuration for that tissue-equivalent medium. Alternatively, if the highest measured SAR for both head and body tissue-equivalent media are ≤ 1.45 W/kg and the ratio of these highest SAR values, i.e., largest divided by smallest value, is ≤ 1.10 , the highest SAR configuration for either head or body tissue-equivalent medium maybe used to perform the repeated measurement. These additional measurements are repeated after the completion of all measurements requiring the same head or body tissue-equivalent medium in a frequency band. The test device should be returned to ambient conditions (normal room temperature) with the battery fully charged before it is re-mounted on the device holder for the repeated measurement(s) to minimize any unexpected variations in the repeated results.

SAR repeated measurement procedure:

- 1. When the highest measured SAR is < 0.80 W/kg, repeated measurement is not required.
- 2. When the highest measured SAR is >= 0.80 W/kg, repeat that measurement once.
- 3. 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, perform a second repeated measurement.
- 4. If the ratio of largest to smallest SAR for the original, first and second repeated measurements is > 1.20, and the original, first or second repeated measurement is >= 1.5 W/kg, perform a third repeated measurement.

Band	Mode	Test Position	Ch.	Original Measured SAR-1g (W/kg)	1st Repeated SAR-1g (W/kg)	L/S Ratio	2nd Repeated SAR-1g (W/kg)	L/S Ratio	3rd Repeated SAR-1g (W/kg)	L/S Ratio
WLAN2.4G	802.11b	Bottom	6	0.921	0.913	1.01	N/A	N/A	N/A	N/A
WLAN5.3G	802.11a	Bottom	52	1.08	1.06	1.02	N/A	N/A	N/A	N/A
WLAN5.6G	802.11a	Bottom	132	1.11	1.09	1.02	N/A	N/A	N/A	N/A
WLAN5.8G	802.11a	Bottom	149	1.12	1.10	1.02	N/A	N/A	N/A	N/A

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4.7.4 Simultaneous Multi-band Transmission Evaluation

<Possibilities of Simultaneous Transmission>

The simultaneous transmission possibilities for this device are listed as below.

Simultaneous TX Combination	Capable Transmit Configurations	Body Exposure Condition
1	WLAN2.4G TX1 + BT TX2	Yes
2	WLAN2.4G TX2 + BT TX2	Yes
3	WLAN5G TX1 + BT TX2	Yes
4	WLAN5G TX2 + BT TX2	Yes

Note: The WLAN 2.4G and WLAN 5G cannot transmit simultaneously.

<Estimated SAR Calculation>

According to KDB 447498 D01, when standalone SAR test exclusion applies to an antenna that transmits simultaneously with other antennas, the standalone SAR was estimated according to following formula to result in substantially conservative SAR values of <= 0.4 W/kg to determine simultaneous transmission SAR test exclusion.

$$\text{Estimated SAR} = \frac{\text{Max. Tune up Power}_{(mW)}}{\text{Min. Test Separation Distance}_{(mm)}} \times \frac{\sqrt{f_{(GHz)}}}{7.5}$$

If the minimum test separation distance is < 5 mm, a distance of 5 mm is used for estimated SAR calculation. When the test separation distance is > 50 mm, the 0.4 W/kg is used for SAR-1g.

Mode / Band	Frequency (GHz)	Max. Tune-up Power (dBm)	Test Position	Separation Distance (mm)	Estimated SAR (W/kg)
BT(DSS)	2.48	6.0	Body	0	0.17

Note:

- 1. The separation distance is determined from the outer housing of the EUT to the user.
- 2. When standalone SAR testing is not required, an estimated SAR can be applied to determine simultaneous transmission SAR test exclusion.

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<SAR Summation Analysis>

Simultaneous transmission SAR test exclusion is determined for each operating configuration and exposure condition according to the reported standalone SAR of each applicable simultaneous transmitting antenna. When the sum of SAR_{1g} of all simultaneously transmitting antennas in an operating mode and exposure condition combination is within the SAR limit(SAR_{1g} 1.6 W/kg), the simultaneous transmission SAR is not required. When the sum of SAR_{1g} is greater than the SAR limit (SAR_{1g} 1.6 W/kg), SAR test exclusion is determined by the SPLSR.

Position	WWAN Gap (mm)	1	2	3	4	5	1+5	2+5	3+5	4+5
		WLAN 2.4GHz Tx1	WLAN 2.4GHz Tx2	WLAN 5GHz Tx1	WLAN 5GHz Tx2	BT Tx2	Summing result 1g SAR W/kg	Summing result 1g SAR W/kg	Summing result 1g SAR W/kg	Summing result 1g SAR W/kg
		1g SAR W/kg	1g SAR W/kg	1g SAR W/kg	1g SAR W/kg	1g SAR W/kg				
Bottom	0	0.94	0.78	1.19	0.90	0.17	1.11	0.95	1.36	1.07

Test Engineer: Willy Chang, and Matt Cheng

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5. Calibration of Test Equipment

Equipment	Manufacturer	Model	SN	Cal. Date	Cal. Interval	
System Validation Dipole	SPEAG	D2450V2	835	Jun. 27, 2019	1 Year	
System Validation Dipole	SPEAG	D5GHzV2	1019	Mar. 21, 2019	1 Year	
Dosimetric E-Field Probe	SPEAG	EX3DV4	3898	Jun. 27, 2019	1 Year	
Data Acquisition Electronics	SPEAG	DAE4	916	Dec. 12, 2018	1 Year	
Spectrum Analyzer	R&S	FSL6	102006	Mar. 26, 2019	1 Year	
ENA Series Network Analyzer	Agilent	E5071C	MY46214281	Jun. 17, 2019	1 Year	
MXG Analong Signal Generator	Agilent	N5181A	MY50143868	Jun. 27, 2019	1 Year	
Power Meter	Anritsu	ML2495A	1218009	Jun. 28, 2019	1 Year	
Power Sensor	Anritsu	MA2411B	1207252	Jun. 28, 2019	1 Year	
Thermometer	YFE	YF-160A	130504591	Mar. 22, 2019	1 Year	

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6. Measurement Uncertainty

According to KDB 865664 D01, 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, and \geq 3.75 W/kg for 10-g SAR. The procedures described in IEEE Std 1528-2013should be applied. The expanded SAR measurement uncertainty must be \leq 30%, for a confidence interval of k = 2. When the highest measured SAR within a frequency band is < 1.5 W/kg for 1-g and < 3.75 W/kg for 10-g, the extensive SAR measurement uncertainty analysis described in IEEE Std 1528-2013 is not required in SAR reports submitted for equipment approval. Hence, the measurement uncertainty analysis is not required in this SAR report because the test result met the condition.

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7. Information of the Testing Laboratories

We, Bureau Veritas Consumer Products Services (H.K.) Ltd., Taoyuan Branch, were founded in 1988 to provide our best service in EMC, Radio, Telecom and Safety consultation. Our laboratories are accredited and approved according to ISO/IEC 17025.

If you have any comments, please feel free to contact us at the following:

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Email: service.adt@tw.bureauveritas.com

Web Site: https://ee.bureauveritas.com.tw/BVInternet/Default

The road map of all our labs can be found in our web site also.

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Appendix A. SAR Plots of System Verification

The plots for system verification with largest deviation for each SAR system combination are shown as follows.

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System Check_H2450_190905

DUT: Dipole 2450 MHz; Type: D2450V2; SN: 835

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

Medium: H19T27N1_0905 Medium parameters used: f = 2450 MHz; $\sigma = 1.873$ S/m; $\varepsilon_r = 38.701$; ρ

Date: 2019/09/05

 $= 1000 \text{ kg/m}^3$

Ambient Temperature : 23.5 °C; Liquid Temperature : 23.3 °C

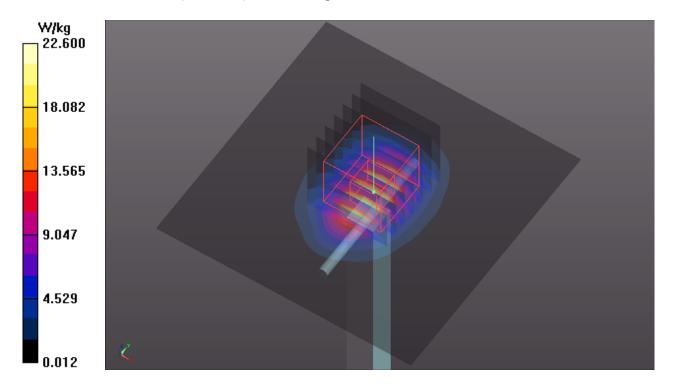
DASY5 Configuration:

- Probe: EX3DV4 SN3898; ConvF(7.56, 7.56, 7.56); Calibrated: 2019/06/27
- Sensor-Surface: 1.4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn916; Calibrated: 2018/12/12
- Phantom: ELI Phantom 1204; Type: QDOVA;
- Measurement SW: DASY52, Version 52.10 (2); SEMCAD X Version 14.6.12 (7450)

Pin=250mW/Area Scan (81x81x1): Interpolated grid: dx=1.200 mm, dy=1.200 mm Maximum value of SAR (interpolated) = 22.6 W/kg

Pin=250mW/Zoom Scan (7x7x7)/Cube 0: Measurement grid: dx=5mm, dy=5mm, dz=5mm Reference Value = 106.2 V/m; Power Drift = -0.01 dB Peak SAR (extrapolated) = 28.4 W/kg

SAR(1 g) = 13.3 W/kg; SAR(10 g) = 6.06 W/kgMaximum value of SAR (measured) = 22.8 W/kg



Test Laboratory: Bureau Veritas ADT SAR/HAC Testing Lab

System Check_H5250_190905

DUT: Dipole 5 GHz; Type: D5GHzV2; SN: 1019

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

Medium: H34T60N1_0905 Medium parameters used: f = 5250 MHz; $\sigma = 4.529$ S/m; $\varepsilon_r = 34.481$; ρ

Date: 2019/09/05

 $= 1000 \text{ kg/m}^3$

Ambient Temperature : 23.5 °C; Liquid Temperature : 23.3 °C

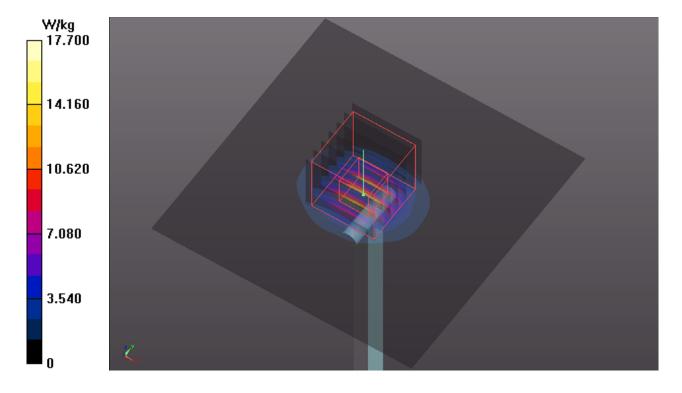
DASY5 Configuration:

- Probe: EX3DV4 SN3898; ConvF(5.33, 5.33, 5.33); Calibrated: 2019/06/27
- Sensor-Surface: 1.4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn916; Calibrated: 2018/12/12
- Phantom: ELI Phantom 1204; Type: QDOVA;
- Measurement SW: DASY52, Version 52.10 (2); SEMCAD X Version 14.6.12 (7450)

Pin=100mW/Area Scan (91x91x1): Interpolated grid: dx=1.000 mm, dy=1.000 mm Maximum value of SAR (interpolated) = 17.7 W/kg

Pin=100mW/Zoom Scan (7x7x12)/Cube 0: Measurement grid: dx=4mm, dy=4mm, dz=2mm Reference Value = 71.06 V/m; Power Drift = 0.04 dB Peak SAR (extrapolated) = 33.2 W/kg

SAR(1 g) = 7.67 W/kg; SAR(10 g) = 2.2 W/kgMaximum value of SAR (measured) = 19.6 W/kg



Test Laboratory: Bureau Veritas ADT SAR/HAC Testing Lab

System Check_H5600_190905

DUT: Dipole 5 GHz; Type: D5GHzV2; SN: 1019

Communication System: CW; Frequency: 5600 MHz; Duty Cycle: 1:1

Medium: H34T60N1_0905 Medium parameters used: f = 5600 MHz; $\sigma = 4.871$ S/m; $\varepsilon_r = 33.999$; ρ

Date: 2019/09/05

 $= 1000 \text{ kg/m}^3$

Ambient Temperature : 23.5 °C; Liquid Temperature : 23.3 °C

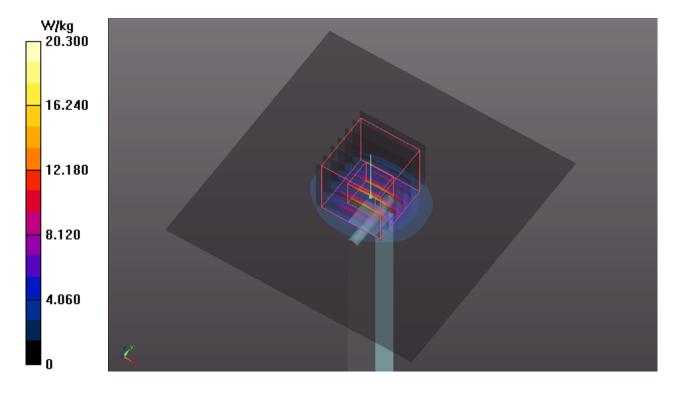
DASY5 Configuration:

- Probe: EX3DV4 SN3898; ConvF(4.85, 4.85, 4.85); Calibrated: 2019/06/27
- Sensor-Surface: 1.4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn916; Calibrated: 2018/12/12
- Phantom: ELI Phantom 1204; Type: QDOVA;
- Measurement SW: DASY52, Version 52.10 (2); SEMCAD X Version 14.6.12 (7450)

Pin=100mW/Area Scan (91x91x1): Interpolated grid: dx=1.000 mm, dy=1.000 mm Maximum value of SAR (interpolated) = 20.3 W/kg

Pin=100mW/Zoom Scan (7x7x12)/Cube 0: Measurement grid: dx=4mm, dy=4mm, dz=2mm Reference Value = 73.62 V/m; Power Drift = -0.14 dB Peak SAR (extrapolated) = 37.3 W/kg

SAR(1 g) = 8.18 W/kg; SAR(10 g) = 2.33 W/kgMaximum value of SAR (measured) = 21.3 W/kg



Test Laboratory: Bureau Veritas ADT SAR/HAC Testing Lab

System Check_H5750_190905

DUT: Dipole 5 GHz; Type: D5GHzV2; SN: 1019

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

Medium: H34T60N1_0905 Medium parameters used: f = 5750 MHz; σ = 5.022 S/m; ϵ_r = 33.784; ρ

Date: 2019/09/05

 $= 1000 \text{ kg/m}^3$

Ambient Temperature : 23.5 °C; Liquid Temperature : 23.3 °C

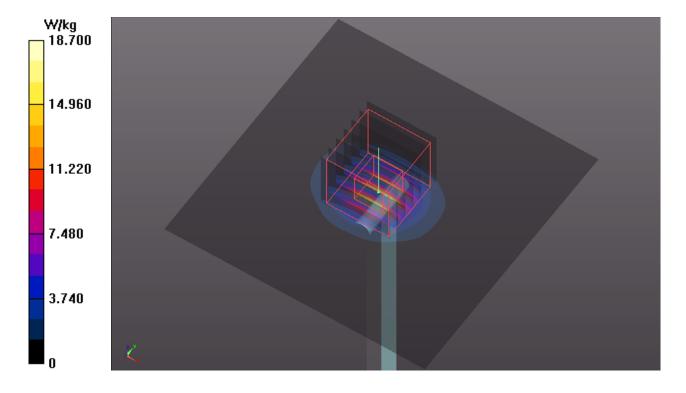
DASY5 Configuration:

- Probe: EX3DV4 SN3898; ConvF(4.95, 4.95, 4.95); Calibrated: 2019/06/27
- Sensor-Surface: 1.4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn916; Calibrated: 2018/12/12
- Phantom: ELI Phantom 1204; Type: QDOVA;
- Measurement SW: DASY52, Version 52.10 (2); SEMCAD X Version 14.6.12 (7450)

Pin=100mW/Area Scan (91x91x1): Interpolated grid: dx=1.000 mm, dy=1.000 mm Maximum value of SAR (interpolated) = 18.7 W/kg

Pin=100mW/Zoom Scan (7x7x12)/Cube 0: Measurement grid: dx=4mm, dy=4mm, dz=2mm Reference Value = 61.50 V/m; Power Drift = 0.04 dB Peak SAR (extrapolated) = 35.9 W/kg

SAR(1 g) = 7.91 W/kg; SAR(10 g) = 2.26 W/kgMaximum value of SAR (measured) = 20.9 W/kg







Appendix B. SAR Plots of SAR Measurement

The SAR plots for highest measured SAR in each exposure configuration, wireless mode and frequency band combination, and measured SAR > 1.5 W/kg are shown as follows.

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P01 WLAN2.4G_802.11b_Bottom_0mm_Ch6_TX1

DUT: 190812C11

Communication System: WLAN 2.4G; Frequency: 2437 MHz; Duty Cycle: 1:1

Medium: H19T27N1_0905 Medium parameters used: f = 2437 MHz; $\sigma = 1.856$ S/m; $\varepsilon_r = 38.73$; $\rho = 1.856$ MHz; $\sigma = 1.856$ S/m; $\sigma = 1.856$ MHz; $\sigma = 1.856$ S/m; $\sigma = 1.856$ S

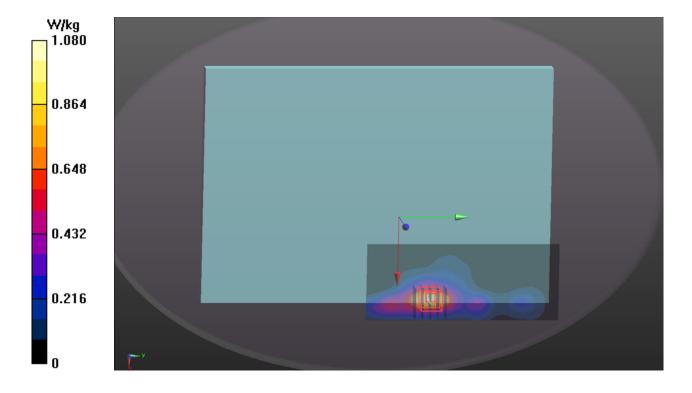
Date: 2019/09/05

 1000 kg/m^3

Ambient Temperature : 23.5 °C; Liquid Temperature : 23.3 °C

DASY5 Configuration:

- Probe: EX3DV4 SN3898; ConvF(7.56, 7.56, 7.56); Calibrated: 2019/06/27
- Sensor-Surface: 1.4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn916; Calibrated: 2018/12/12
- Phantom: ELI Phantom 1204; Type: QDOVA;
- Measurement SW: DASY52, Version 52.10 (2); SEMCAD X Version 14.6.12 (7450)
- Area Scan (71x171x1): Interpolated grid: dx=1.200 mm, dy=1.200 mm Maximum value of SAR (interpolated) = 1.08 W/kg
- Zoom Scan (5x5x7)/Cube 0: Measurement grid: dx=8mm, dy=8mm, dz=5mm Reference Value = 24.33 V/m; Power Drift = -0.06 dB Peak SAR (extrapolated) = 1.77 W/kg SAR(1 g) = 0.921 W/kg; SAR(10 g) = 0.465 W/kg Maximum value of SAR (measured) = 1.34 W/kg



P02 WLAN5.3G_802.11a_Bottom_0mm_Ch52_TX1

DUT: 190812C11

Communication System: WLAN_5G; Frequency: 5260 MHz; Duty Cycle: 1:1

Medium: H34T60N1 0905 Medium parameters used: f = 5260 MHz; $\sigma = 4.543$ S/m; $\varepsilon_r = 34.465$; ρ

Date: 2019/09/05

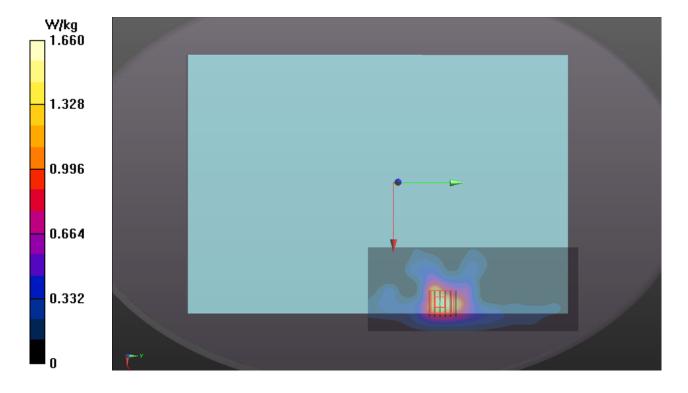
 $= 1000 \text{ kg/m}^3$

Ambient Temperature : 23.5 °C; Liquid Temperature : 23.3 °C

DASY5 Configuration:

- Probe: EX3DV4 SN3898; ConvF(5.33, 5.33, 5.33); Calibrated: 2019/06/27
- Sensor-Surface: 1.4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn916; Calibrated: 2018/12/12
- Phantom: ELI Phantom 1204; Type: QDOVA;
- Measurement SW: DASY52, Version 52.10 (2); SEMCAD X Version 14.6.12 (7450)
- Area Scan (81x201x1): Interpolated grid: dx=1.000 mm, dy=1.000 mm Maximum value of SAR (interpolated) = 1.66 W/kg
- Zoom Scan (6x6x12)/Cube 0: Measurement grid: dx=5mm, dy=5mm, dz=2mm Reference Value = 17.13 V/m; Power Drift = -0.14 dB Peak SAR (extrapolated) = 2.76 W/kg SAR(1 g) = 1.08 W/kg; SAR(10 g) = 0.446 W/kg

SAR(1 g) = 1.08 W/kg; SAR(10 g) = 0.446 W/kg Maximum value of SAR (measured) = 2.03 W/kg



P03 WLAN5.6G 802.11a Bottom 0mm Ch132 TX1

DUT: 190812C11

Communication System: WLAN_5G; Frequency: 5660 MHz; Duty Cycle: 1:1

Medium: H34T60N1 0905 Medium parameters used: f = 5660 MHz; $\sigma = 4.931$ S/m; $\varepsilon_r = 33.917$; ρ

Date: 2019/09/05

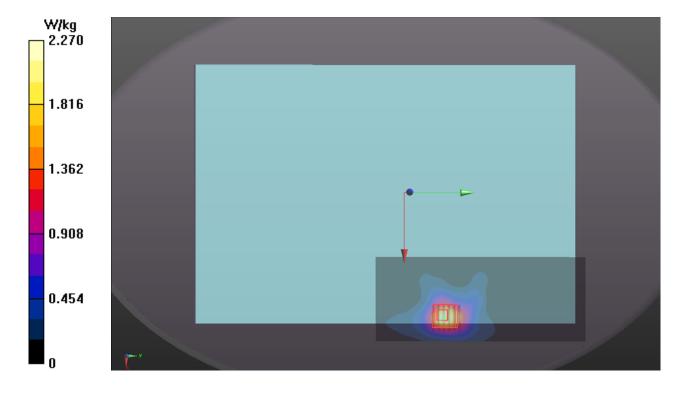
 $= 1000 \text{ kg/m}^3$

Ambient Temperature: 23.5 °C; Liquid Temperature: 23.3 °C

DASY5 Configuration:

- Probe: EX3DV4 SN3898; ConvF(4.85, 4.85, 4.85); Calibrated: 2019/06/27
- Sensor-Surface: 1.4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn916; Calibrated: 2018/12/12
- Phantom: ELI Phantom 1204; Type: QDOVA;
- Measurement SW: DASY52, Version 52.10 (2); SEMCAD X Version 14.6.12 (7450)
- Area Scan (81x201x1): Interpolated grid: dx=1.000 mm, dy=1.000 mm Maximum value of SAR (interpolated) = 2.27 W/kg
- **Zoom Scan (6x6x12)/Cube 0:** Measurement grid: dx=5mm, dy=5mm, dz=2mm Reference Value = 21.63 V/m; Power Drift = -0.05 dB Peak SAR (extrapolated) = 3.13 W/kg

SAR(1 g) = 1.11 W/kg; SAR(10 g) = 0.467 W/kgMaximum value of SAR (measured) = 2.25 W/kg



P04 WLAN5.8G_802.11a_Bottom_0mm_Ch149_TX1

DUT: 190812C11

Communication System: WLAN_5G; Frequency: 5745 MHz; Duty Cycle: 1:1

Medium: H34T60N1 0905 Medium parameters used: f = 5745 MHz; $\sigma = 5.019$ S/m; $\varepsilon_r = 33.79$; $\rho =$

Date: 2019/09/05

 1000 kg/m^3

Ambient Temperature : 23.5 °C; Liquid Temperature : 23.3 °C

DASY5 Configuration:

- Probe: EX3DV4 SN3898; ConvF(4.95, 4.95, 4.95); Calibrated: 2019/06/27
- Sensor-Surface: 1.4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn916; Calibrated: 2018/12/12
- Phantom: ELI Phantom 1204; Type: QDOVA;
- Measurement SW: DASY52, Version 52.10 (2); SEMCAD X Version 14.6.12 (7450)
- Area Scan (81x201x1): Interpolated grid: dx=1.000 mm, dy=1.000 mm Maximum value of SAR (interpolated) = 1.88 W/kg
- Zoom Scan (6x6x12)/Cube 0: Measurement grid: dx=5mm, dy=5mm, dz=2mm Reference Value = 18.99 V/m; Power Drift = -0.15 dB Peak SAR (extrapolated) = 3.16 W/kg SAR(1 g) = 1.12 W/kg; SAR(10 g) = 0.439 W/kg

SAR(1 g) = 1.12 W/kg; SAR(10 g) = 0.439 W/kgMaximum value of SAR (measured) = 2.23 W/kg

