Variant FCC SAR Test Report

APPLICANT	**:**	**Zebra Technologies Corporation**
EQUIPMENT	**:**	**Enterprise Digital Assistant (EDA)**
BRAND NAME	**:**	**Zebra**
MODEL NAME	**:**	**MC55N0**
FCC ID	**:**	**UZ7MC55N0**
STANDARD	**:**	**FCC 47 CFR Part 2 (2.1093)**
		ANSI/IEEE C95.1-1992
		IEEE 1528-2003

We, SPORTON INTERNATIONAL INC., would like to declare that the tested sample has been evaluated in accordance with the procedures and had been in compliance with the applicable technical standards.

The test results in this report apply exclusively to the tested model / sample. Without written approval of SPORTON INTERNATIONAL INC., the test report shall not be reproduced except in full.

Reviewed by: Eric Huang / Deputy Manager

Approved by: Jones Tsai / Manager

ilac-MRA

TAF
Testing Laboratory
1190

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FCC ID : UZ7MC55N0
Page 1 of 23
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Table of Contents

Revision History

REPORT NO.	VERSION	DESCRIPTION	ISSUED DATE
FA141402-04	Rev. 01	Updating the standard FCC new rule.	Jun. 29, 2015

1. *Statement of Compliance*

The maximum results of Specific Absorption Rate (SAR) found during testing for **Zebra Technologies Corporation, Enterprise Digital Assistant (EDA), MC55N0**, are as follows.

Equipment Class	Frequency Band	Highest SAR Summary	
		Head (Separation 0mm)	Body-worn (Separation 15mm)
		1g SAR (W/kg)	
NII	5.2GHz WLAN	0.31	0.49
	5.8GHz WLAN	**0.56**	**0.85**
Date of Testing:		2015/06/17	

This device is in compliance with Specific Absorption Rate (SAR) for general population/uncontrolled exposure limits (1.6 W/kg) specified in FCC 47 CFR part 2 (2.1093) and ANSI/IEEE C95.1-1992, and had been tested in accordance with the measurement methods and procedures specified in IEEE 1528-2003.

2. *Administration Data*

Testing Laboratory	
Test Site	SPORTON INTERNATIONAL INC.
Test Site Location	No.52, Hwa Ya 1st Rd., Hwa Ya Technology Park, Kwei-Shan District, Taoyuan City, Taiwan (R.O.C.) TEL: +886-3-327-3456 FAX: +886-3-328-4978

Applicant	
Company Name	Zebra Technologies Corporation
Address	1 Zebra Plaza, Holtsville, NY 11742

Manufacturer	
Company Name	Zebra Technologies Corporation
Address	1 Zebra Plaza, Holtsville, NY 11742

3. *Guidance Standard*

The Specific Absorption Rate (SAR) testing specification, method, and procedure for this device is in accordance with the following standards:
- FCC 47 CFR Part 2 (2.1093)
- ANSI/IEEE C95.1-1992
- IEEE 1528-2003
- FCC KDB 865664 D01 SAR Measurement 100 MHz to 6 GHz v01r03
- FCC KDB 865664 D02 SAR Reporting v01r01
- FCC KDB 447498 D01 General RF Exposure Guidance v05r02
- FCC KDB 648474 D04 SAR Evaluation Considerations for Wireless Handsets v01r02
- FCC KDB 248227 D01 802.11 Wi-Fi SAR v02r01

4. *Equipment Under Test (EUT)*

4.1 *General Information*

Product Feature & Specification	
Equipment Name	Enterprise Digital Assistant (EDA)
Brand Name	Zebra
Model Name	MC55N0
FCC ID	UZ7MC55N0
Wireless Technology and Frequency Range	WLAN 2.4GHz Band: 2412 MHz ~ 2462 MHz WLAN 5.2GHz Band: 5180 MHz ~ 5240 MHz WLAN 5.3GHz Band: 5260 MHz ~ 5320 MHz WLAN 5.5GHz Band: 5500 MHz ~ 5700 MHz WLAN 5.8GHz Band: 5745 MHz ~ 5825 MHz Bluetooth: 2402 MHz ~ 2480 MHz
Mode	· 802.11a/b/g/n HT20 · Bluetooth v2.1+EDR
HW Version	Rev B
SW Version	02.47.0004
FW Version	05.02.29217
EUT Stage	Identical Prototype

4.2 *Maximum Tune-up Limit*

Band / Frequency (MHz)		IEEE 802.11 Average Power (dBm)	
		11a	HT20
5.2GHz Band	5180	16.0	16.0
	5200	18.5	18.5
	5220	18.5	19.0
	5240	19.5	19.5
5.8GHz Band	5745	16.5	16.5
	5785	22.0	22.5
	5825	17.5	18.0

5. *RF Exposure Limits*

5.1 *Uncontrolled Environment*

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

5.2 *Controlled Environment*

Controlled Environments are defined as locations where there is exposure that may be incurred by persons who are aware of the potential for exposure, (i.e. as a result of employment or occupation). In general, occupational/controlled exposure limits are applicable to situations in which persons are exposed as a consequence of their employment, who have been made fully aware of the potential for exposure and can exercise control over their exposure. The exposure category is also applicable when the exposure is of a transient nature due to incidental passage through a location where the exposure levels may be higher than the general population/uncontrolled limits, but the exposed person is fully aware of the potential for exposure and can exercise control over his or her exposure by leaving the area or by some other appropriate means.

Limits for Occupational/Controlled Exposure (W/kg)

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

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

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

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

6. *Specific Absorption Rate (SAR)*

6.1 *Introduction*

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

6.2 *SAR Definition*

The SAR definition is the time derivative (rate) of the incremental energy (dW) absorbed by (dissipated in) an incremental mass (dm) contained in a volume element (dv) of a given density (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)

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

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

7. *System Description and Setup*

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

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

8. *Measurement Procedures*

The measurement procedures are as follows:

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

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

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

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

8.1 *Spatial Peak SAR Evaluation*

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

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

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

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

8.2 _Power Reference Measurement_

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

8.3 _Area Scan_

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

Area scan parameters extracted from FCC KDB 865664 D01v01r03 SAR measurement 100 MHz to 6 GHz.

	≤ 3 GHz	> 3 GHz
Maximum distance from closest measurement point (geometric center of probe sensors) to phantom surface	5 ± 1 mm	$\frac{1}{2} \cdot \delta \cdot \ln(2) \pm 0.5$ mm
Maximum probe angle from probe axis to phantom surface normal at the measurement location	$30° \pm 1°$	$20° \pm 1°$
Maximum area scan spatial resolution: Δx_{Area}, Δy_{Area}	≤ 2 GHz: ≤ 15 mm $2 - 3$ GHz: ≤ 12 mm	$3 - 4$ GHz: ≤ 12 mm $4 - 6$ GHz: ≤ 10 mm
	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.	

8.4 Zoom Scan

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

Zoom scan parameters extracted from FCC KDB 865664 D01v01r03 SAR measurement 100 MHz to 6 GHz.

			$\leq$ 3 GHz	$>$ 3 GHz
Maximum zoom scan spatial resolution: Δx_{Zoom}, Δy_{Zoom}			$\leq$ 2 GHz: $\leq$ 8 mm 2 − 3 GHz: $\leq$ 5 mm*	3 − 4 GHz: $\leq$ 5 mm* 4 − 6 GHz: $\leq$ 4 mm*
Maximum zoom scan spatial resolution, normal to phantom surface	uniform grid: $\Delta z_{Zoom}(n)$		$\leq$ 5 mm	3 − 4 GHz: $\leq$ 4 mm 4 − 5 GHz: $\leq$ 3 mm 5 − 6 GHz: $\leq$ 2 mm
	graded grid	$\Delta z_{Zoom}(1)$: between 1st two points closest to phantom surface	$\leq$ 4 mm	3 − 4 GHz: $\leq$ 3 mm 4 − 5 GHz: $\leq$ 2.5 mm 5 − 6 GHz: $\leq$ 2 mm
		$\Delta z_{Zoom}(n>1)$: between subsequent points	$\leq 1.5 \cdot \Delta z_{Zoom}(n-1)$	
Minimum zoom scan volume	x, y, z		$\geq$ 30 mm	3 − 4 GHz: $\geq$ 28 mm 4 − 5 GHz: $\geq$ 25 mm 5 − 6 GHz: $\geq$ 22 mm

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

* When zoom scan is required and the *reported* SAR from the *area scan based 1-g SAR estimation* procedures of KDB 447498 is $\leq$ 1.4 W/kg, $\leq$ 8 mm, $\leq$ 7 mm and $\leq$ 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.

8.5 Volume Scan Procedures

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

8.6 Power Drift Monitoring

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

9. *Test Equipment List*

Manufacturer	Name of Equipment	Type/Model	Serial Number	Calibration	
				Last Cal.	Due Date
SPEAG	5GHz System Validation Kit	D5GHzV2	1006	Sep. 25, 2014	Sep. 24, 2015
SPEAG	Data Acquisition Electronics	DAE4	1279	Jul. 23, 2014	Jul. 22, 2015
SPEAG	Dosimetric E-Field Probe	EX3DV4	3954	Nov. 21, 2014	Nov. 20, 2015
Wisewind	Thermometer	HTC-1	TM642	Oct. 21, 2014	Oct. 20, 2015
SPEAG	Device Holder	N/A	N/A	N/A	N/A
Agilent	Signal Generator	N5181A	MY50145381	Dec. 11, 2014	Dec. 10, 2015
Agilent	ENA Network Analyzer	E5071C	MY46316648	Feb. 11, 2015	Feb. 10, 2016
SPEAG	Dielectric Probe Kit	DAK-3.5	1138	Nov. 18, 2014	Nov. 17, 2015
Anritsu	Power Meter	ML2495A	1349001	Dec. 03, 2014	Dec. 02, 2015
Anritsu	Power Sensor	MA2411B	1306099	Dec. 03, 2014	Dec. 02, 2015
R&S	Spectrum Analyzer	FSP 7	101131	Jul. 10, 2014	Jul. 09, 2015
Agilent	Dual Directional Coupler	778D	50422	Note 1	
Woken	Attenuator 1	WK0602-XX	N/A	Note 1	
PE	Attenuator 2	PE7005-10	N/A	Note 1	
PE	Attenuator 3	PE7005- 3	N/A	Note 1	
AR	Power Amplifier	5S1G4M2	0328767	Note 1	
Mini-Circuits	Power Amplifier	ZVE-3W	162601250	Note 1	

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

10. *System Verification*

10.1 *Tissue Verification*

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

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

Simulating Liquid for 5GHz, Manufactured by SPEAG

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

<Tissue Dielectric Parameter Check Results>

Frequency (MHz)	Tissue Type	Liquid Temp. (℃)	Conductivity (σ)	Permittivity (εr)	Conductivity Target (σ)	Permittivity Target (εr)	Delta (σ) (%)	Delta (εr) (%)	Limit (%)	Date
5200	HSL	22.3	4.600	36.700	4.66	36.00	-1.29	1.94	±5	2015/6/17
5200	MSL	22.3	5.360	48.300	5.30	49.00	1.13	-1.43	±5	2015/6/17
5800	HSL	22.3	5.220	35.900	5.27	35.30	-0.95	1.70	±5	2015/6/17
5800	MSL	22.3	6.240	47.200	6.00	48.20	4.00	-2.07	±5	2015/6/17

10.2 *System Performance Check Results*

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

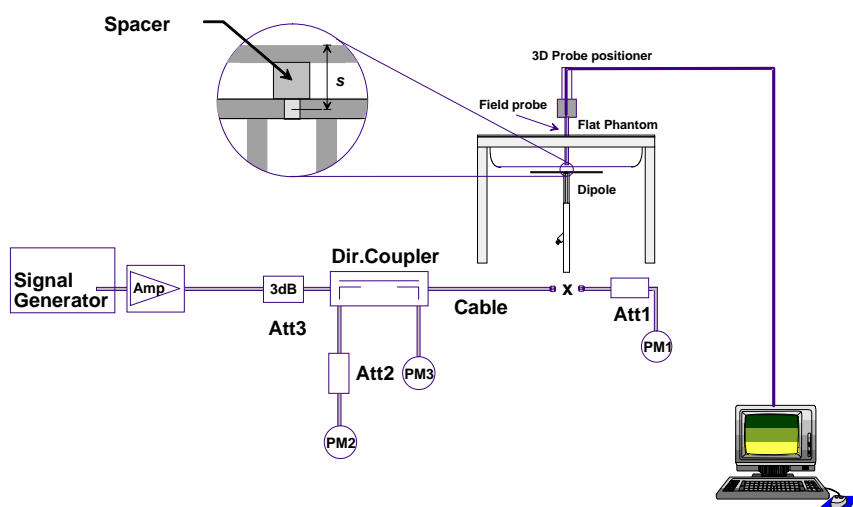| Date	Frequency (MHz)2	Tissue Type2	Input Power (mW)	Dipole S/N	Probe S/N	DAE S/N	Measured 1g SAR (W/kg)	Targeted 1g SAR (W/kg)	Normalized 1g SAR (W/kg)	Deviation (%)
2015/6/17	5200	HSL	100	D5GHzV2-1006	EX3DV4 - SN3954	DAE4 Sn1279	7.89	81.10	78.90	-2.71
2015/6/17	5200	MSL	100	D5GHzV2-1006	EX3DV4 - SN3954	DAE4 Sn1279	8.12	77.50	81.20	4.77
2015/6/17	5800	HSL	100	D5GHzV2-1006	EX3DV4 - SN3954	DAE4 Sn1279	7.82	82.90	78.20	-5.67
2015/6/17	5800	MSL	100	D5GHzV2-1006	EX3DV4 - SN3954	DAE4 Sn1279	7.61	78.40	76.10	-2.93

Fig 8.3.1 System Performance Check Setup

Fig 8.3.2 Setup Photo

11. RF Exposure Positions

11.1 Ear and handset reference point

Figure 9.1.1 shows the front, back, and side views of the SAM phantom. The center-of-mouth reference point is labeled "M," the left ear reference point (ERP) is marked "LE," and the right ERP is marked "RE." Each ERP is 15 mm along the B-M (back-mouth) line behind the entrance-to-ear-canal (EEC) point, as shown in Figure 9.1.2 The Reference Plane is defined as passing through the two ear reference points and point M. The line N-F (neck-front), also called the reference pivoting line, is normal to the Reference Plane and perpendicular to both a line passing through RE and LE and the B-M line (see Figure 9.1.3). Both N-F and B-M lines should be marked on the exterior of the phantom shell to facilitate handset positioning. Posterior to the N-F line the ear shape is a flat surface with 6 mm thickness at each ERP, and forward of the N-F line the ear is truncated, as illustrated in Figure 9.1.2. The ear truncation is introduced to preclude the ear lobe from interfering with handset tilt, which could lead to unstable positioning at the cheek.
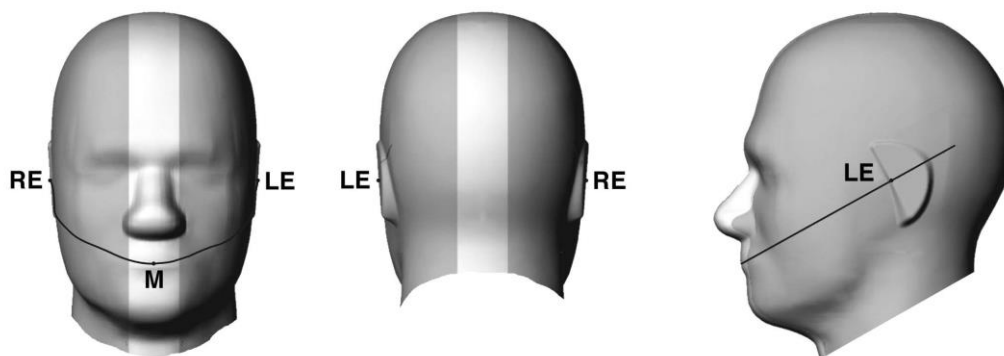

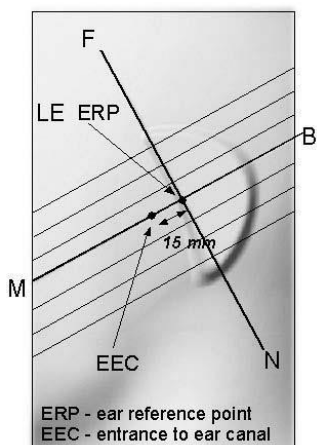**Fig 9.1.1 Front, back, and side views of SAM twin phantom**

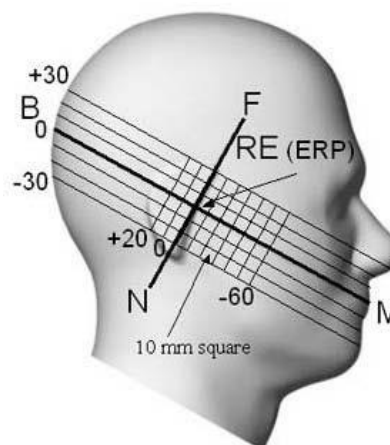**Fig 9.1.2 Close-up side view of phantom showing the ear region.**

Fig 9.1.3 Side view of the phantom showing relevant markings and seven cross-sectional plane locations

11.2 *Definition of the cheek position*

1. Ready the handset for talk operation, if necessary. For example, for handsets with a cover piece (flip cover), open the cover. If the handset can transmit with the cover closed, both configurations must be tested.

2. Define two imaginary lines on the handset—the vertical centerline and the horizontal line. The vertical centerline passes through two points on the front side of the handset—the midpoint of the width wt of the handset at the level of the acoustic output (point A in Figure 9.2.1 and Figure 9.2.2), and the midpoint of the width wb of the bottom of the handset (point B). The horizontal line is perpendicular to the vertical centerline and passes through the center of the acoustic output (see Figure 9.2.1). The two lines intersect at point A. Note that for many handsets, point A coincides with the center of the acoustic output; however, the acoustic output may be located elsewhere on the horizontal line. Also note that the vertical centerline is not necessarily parallel to the front face of the handset (see Figure 9.2.2), especially for clamshell handsets, handsets with flip covers, and other irregularly-shaped handsets.

3. Position the handset close to the surface of the phantom such that point A is on the (virtual) extension of the line passing through points RE and LE on the phantom (see Figure 9.2.3), such that the plane defined by the vertical centerline and the horizontal line of the handset is approximately parallel to the sagittal plane of the phantom.

4. Translate the handset towards the phantom along the line passing through RE and LE until handset point A touches the pinna at the ERP.

5. While maintaining the handset in this plane, rotate it around the LE-RE line until the vertical centerline is in the plane normal to the plane containing B-M and N-F lines, i.e., the Reference Plane.

6. Rotate the handset around the vertical centerline until the handset (horizontal line) is parallel to the N-F line.

7. While maintaining the vertical centerline in the Reference Plane, keeping point A on the line passing through RE and LE, and maintaining the handset contact with the pinna, rotate the handset about the N-F line until any point on the handset is in contact with a phantom point below the pinna on the cheek. See Figure 9.2.3. The actual rotation angles should be documented in the test report.
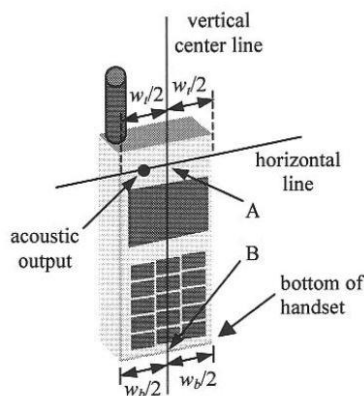

Fig 9.2.1 Handset vertical and horizontal reference lines—"fixed case
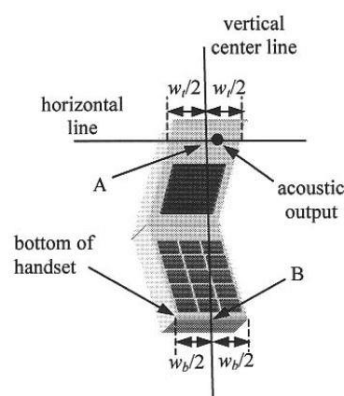
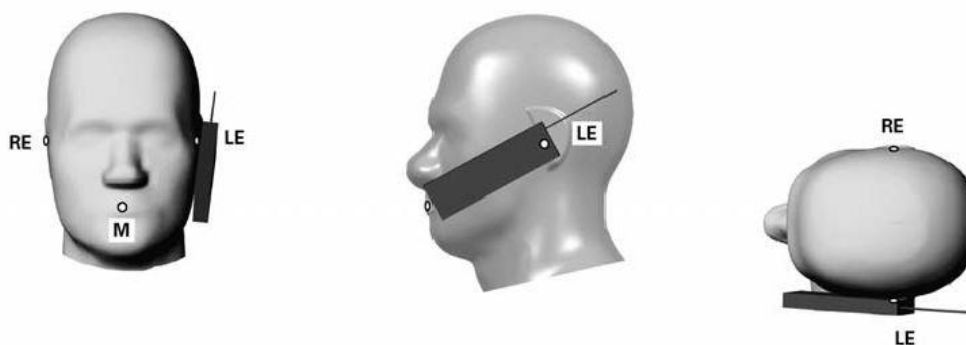**Fig 9.2.2 Handset vertical and horizontal reference lines—"clam-shell case"**

Fig 9.2.3 cheek or touch position. The reference points for the right ear (RE), left ear (LE), and mouth (M), which establish the Reference Plane for handset positioning, are indicated.

11.3 *Definition of the tilt position*

1. Ready the handset for talk operation, if necessary. For example, for handsets with a cover piece (flip cover), open the cover. If the handset can transmit with the cover closed, both configurations must be tested.

2. While maintaining the orientation of the handset, move the handset away from the pinna along the line passing through RE and LE far enough to allow a rotation of the handset away from the cheek by 15°.

3. Rotate the handset around the horizontal line by 15°.

4. While maintaining the orientation of the handset, move the handset towards the phantom on the line passing through RE and LE until any part of the handset touches the ear. The tilt position is obtained when the contact point is on the pinna. See Figure 9.3.1. If contact occurs at any location other than the pinna, e.g., the antenna at the back of the phantom head, the angle of the handset should be reduced. In this case, the tilt position is obtained if any point on the handset is in contact with the pinna and a second point
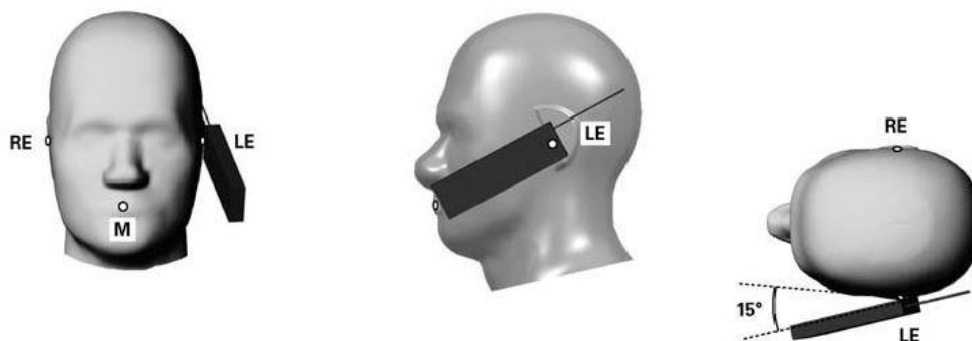

Fig 9.3.1 Tilt position. The reference points for the right ear (RE), left ear (LE), and mouth (M), which define the Reference Plane for handset positioning, are indicated.

11.4 *Body Worn Accessory*

Body-worn operating configurations are tested with the belt-clips and holsters attached to the device and positioned against a flat phantom in a normal use configuration (see Figure 9.4). Per KDB 648474 D04v01r02, body-worn accessory exposure is typically related to voice mode operations when handsets are carried in body-worn accessories. The body-worn accessory procedures in FCC KDB 447498 D01v05r02 should be used to test for body-worn accessory SAR compliance, without a headset connected to it. This enables the test results for such configuration to be compatible with that required for hotspot mode when the body-worn accessory test separation distance is greater than or equal to that required for hotspot mode, when applicable. When the reported SAR for body-worn accessory, measured without a headset connected to the handset is < 1.2 W/kg, the highest reported SAR configuration for that wireless mode and frequency band should be repeated for that body-worn accessory with a handset attached to the handset.

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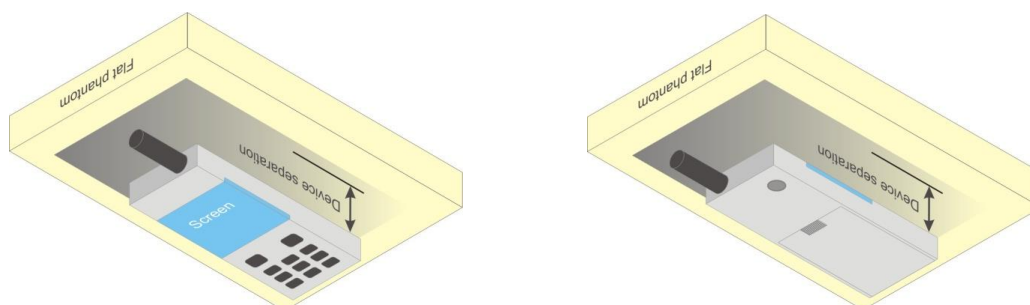

Fig 9.4 Body Worn Position

12. *Conducted RF Output Power (Unit: dBm)*
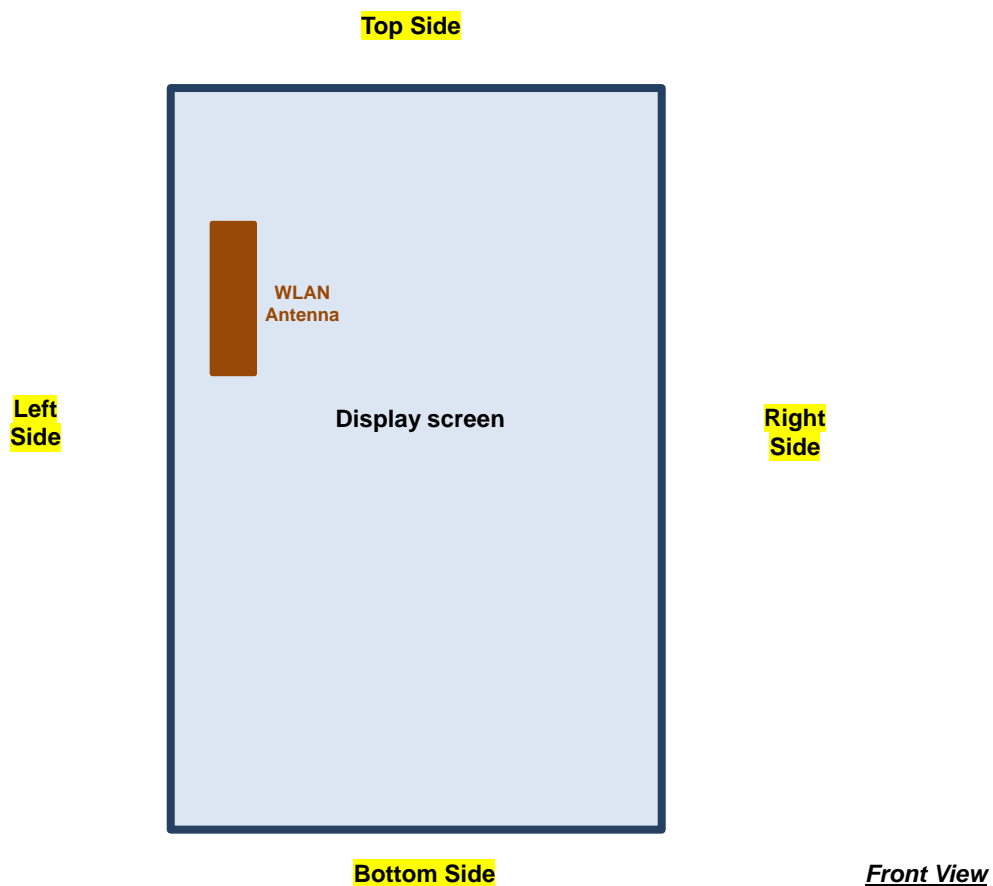
<WLAN Conducted Power>

General Note:

1. Per KDB 248227 D01v02r01, SAR test reduction is determined according to 802.11 transmission mode configurations and certain exposure conditions with multiple test positions. In the 2.4 GHz band, separate SAR procedures are applied to DSSS and OFDM configurations to simplify DSSS test requirements. For OFDM, in both 2.4 and 5 GHz bands, an initial test configuration must be determined for each standalone and aggregated frequency band, according to the transmission mode configuration with the highest maximum output power specified for production units to perform SAR measurements. If the same highest maximum output power applies to different combinations of channel bandwidths, modulations and data rates, additional procedures are applied to determine which test configurations require SAR measurement. When applicable, an initial test position may be applied to reduce the number of SAR measurements required for next to the ear, UMPC mini-tablet or hotspot mode configurations with multiple test positions.

2. For 2.4 GHz 802.11b DSSS, either the initial test position procedure for multiple exposure test positions or the DSSS procedure for fixed exposure position is applied; these are mutually exclusive. For 2.4 GHz and 5 GHz OFDM configurations, the initial test configuration is applied to measure SAR using either the initial test position procedure for multiple exposure test position configurations or the initial test configuration procedures for fixed exposure test conditions. Based on the reported SAR of the measured configurations and maximum output power of the transmission mode configurations that are not included in the initial test configuration, the subsequent test configuration and initial test position procedures are applied to determine if SAR measurements are required for the remaining OFDM transmission configurations. In general, the number of test channels that require SAR measurement is minimized based on maximum output power measured for the test sample(s).

3. For OFDM transmission configurations in the 2.4 GHz and 5 GHz bands, 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 for each frequency band.

4. DSSS and OFDM configurations are considered separately according to the required SAR procedures. SAR is measured in the initial test position using the 802.11 transmission mode configuration required by the DSSS procedure or initial test configuration and subsequent test configuration(s) according to the OFDM procedures.18 The initial test position procedure is described in the following:

   a. When the reported SAR of the initial test position is ≤ 0.4 W/kg, further SAR measurement is not required for the other test positions in that exposure configuration and 802.11 transmission mode combinations within the frequency band or aggregated band.

   b. When the reported SAR of the test position is > 0.4 W/kg, SAR is repeated for the 802.11 transmission mode configuration tested in the initial test position to measure the subsequent next closet/smallest test separation distance and maximum coupling test position on the highest maximum output power channel, until the report SAR is ≤ 0.8 W/kg or all required test position are tested.

   c. For all positions/configurations, when the reported SAR is > 0.8 W/kg, SAR is measured for these test positions/configurations on the subsequent next highest measured output power channel(s) until the reported SAR is ≤ 1.2 W/kg or all required channels are tested.

<5GHz WLAN>

	Mode	Channel	Frequency (MHz)	Data Rate	Average power (dBm)	Tune-Up Limit	Duty Cycle %
5.2GHz WLAN	802.11a	CH 36	5180	6Mbps	15.57	16.00	98.62
		CH 40	5200		18.46	18.50	
		CH 44	5220		18.50	18.50	
		CH 48	5240		19.22	19.50	
	802.11n-HT20	CH 36	5180	MCS0	15.53	16.00	98.37
		CH 40	5200		18.50	18.50	
		CH 44	5220		18.54	19.00	
		CH 48	5240		19.21	19.50	

	Mode	Channel	Frequency (MHz)	Data Rate	Average power (dBm)	Tune-Up Limit	Duty Cycle %
5.8GHz WLAN	802.11a	CH 149	5745	6Mbps	16.27	16.50	98.62
		CH 157	5785		21.82	22.00	
		CH 165	5825		17.40	17.50	
	802.11n-HT20	CH 149	5745	MCS0	16.43	16.50	98.37
		CH 157	5785		22.06	22.50	
		CH 165	5825		17.65	18.00	

13. *Antenna Location*

Top Side

Left Side

WLAN Antenna

Display screen

Right Side

Bottom Side   *Front View*

14. <u>SAR Test Results</u>

General Note:

1. Per KDB 447498 D01v05r02, the reported SAR is the measured SAR value adjusted for maximum tune-up tolerance.
   a. Tune-up scaling Factor = tune-up limit power (mW) / EUT RF power (mW), where tune-up limit is the maximum rated power among all production units.
   b. For SAR testing of WLAN signal with non-100% duty cycle, the measured SAR is scaled-up by the duty cycle scaling factor which is equal to "1/(duty cycle)"
   c. For WLAN: Reported SAR(W/kg)= Measured SAR(W/kg)* Duty Cycle scaling factor * Tune-up scaling factor

2. Per KDB 648474 D04v01r02, 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.

3. Per KDB 865664 D01v01r03, for each frequency band, repeated SAR measurement is required only when the measured SAR is ≥ 0.8W/kg.

4. When the reported SAR of the test position is > 0.4 W/kg, SAR is repeated for the 802.11 transmission mode configuration tested in the initial test position to measure the subsequent next closet/smallest test separation distance and maximum coupling test position on the highest maximum output power channel, until the report SAR is ≤ 0.8 W/kg or all required test position are tested.

5. For all positions / configurations, when the reported SAR is > 0.8 W/kg, SAR is measured for these test positions / configurations on the subsequent next highest measured output power channel(s) until the reported SAR is ≤ 1.2 W/kg or all required channels are tested.

6. During SAR testing the WLAN transmission was verified using a spectrum analyzer.

14.1 <u>Head SAR</u>

Plot No.	Band	Mode	Test Position	Gap (mm)	Ch.	Freq. (MHz)	Average Power (dBm)	Tune-Up Limit (dBm)	Tune-up Scaling Factor	Duty Cycle %	Duty Cycle Scaling Factor	Power Drift (dB)	Measured 1g SAR (W/kg)	Reported 1g SAR (W/kg)
	WLAN5GHz	802.11a 6Mbps	Right Cheek	0mm	48	5240	19.22	19.50	1.067	98.62	1.014	-0.136	0.166	0.180
	WLAN5GHz	802.11a 6Mbps	Right Tilted	0mm	48	5240	19.22	19.50	1.067	98.62	1.014	-0.173	0.262	0.283
	WLAN5GHz	802.11a 6Mbps	Left Cheek	0mm	48	5240	19.22	19.50	1.067	98.62	1.014	-0.178	0.179	0.194
	WLAN5GHz	802.11a 6Mbps	Left Tilted	0mm	48	5240	19.22	19.50	1.067	98.62	1.014	-0.037	0.290	0.314
	WLAN5GHz	802.11n-HT20 MCS0	Right Cheek	0mm	157	5785	22.06	22.50	1.106	98.37	1.017	0.07	0.227	0.255
	WLAN5GHz	802.11n-HT20 MCS0	Right Tilted	0mm	157	5785	22.06	22.50	1.106	98.37	1.017	-0.126	0.306	0.344
	WLAN5GHz	802.11n-HT20 MCS0	Left Cheek	0mm	157	5785	22.06	22.50	1.106	98.37	1.017	0.178	0.394	0.443
	WLAN5GHz	802.11n-HT20 MCS0	Left Tilted	0mm	157	5785	22.06	22.50	1.106	98.37	1.017	0.009	0.493	0.555

14.2 <u>Body Worn Accessory SAR</u>

Plot No.	Band	Mode	Test Position	Gap (mm)	Ch.	Freq. (MHz)	Average Power (dBm)	Tune-Up Limit (dBm)	Tune-up Scaling Factor	Duty Cycle %	Duty Cycle Scaling Factor	Power Drift (dB)	Measured 1g SAR (W/kg)	Reported 1g SAR (W/kg)
	WLAN5GHz	802.11a 6Mbps	Front	15mm	48	5240	19.22	19.50	1.067	98.62	1.014	0.09	0.102	0.110
	WLAN5GHz	802.11a 6Mbps	Back	15mm	48	5240	19.22	19.50	1.067	98.62	1.014	-0.029	0.453	0.490
	WLAN5GHz	802.11n-HT20 MCS0	Front	15mm	157	5785	22.06	22.50	1.106	98.37	1.017	-0.002	0.133	0.150
	WLAN5GHz	802.11n-HT20 MCS0	Back	15mm	157	5785	22.06	22.50	1.106	98.37	1.017	-0.009	0.756	0.851
	WLAN5GHz	802.11n-HT20 MCS0	Back	15mm	165	5825	17.65	18.00	1.084	98.37	1.017	-0.027	0.343	0.378

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15. *Uncertainty Assessment*

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

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

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

Uncertainty Distributions	Normal	Rectangular	Triangular	U-Shape
Multi-plying Factor[a]	$1/k$[b]	$1/\sqrt{3}$	$1/\sqrt{6}$	$1/\sqrt{2}$

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

(b) κ is the coverage factor

Table 16.1. Standard Uncertainty for Assumed Distribution

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

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

Error Description	Uncertainty Value (±%)	Probability Distribution	Divisor	Ci (1g)	Ci (10g)	Standard Uncertainty (1g)	Standard Uncertainty (10g)
Measurement System							
Probe Calibration	6.55	Normal	1	1	1	± 6.55 %	± 6.55 %
Axial Isotropy	4.7	Rectangular	√3	0.7	0.7	± 1.9 %	± 1.9 %
Hemispherical Isotropy	9.6	Rectangular	√3	0.7	0.7	± 3.9 %	± 3.9 %
Boundary Effects	2.0	Rectangular	√3	1	1	± 1.2 %	± 1.2 %
Linearity	4.7	Rectangular	√3	1	1	± 2.7 %	± 2.7 %
System Detection Limits	1.0	Rectangular	√3	1	1	± 0.6 %	± 0.6 %
Readout Electronics	0.3	Normal	1	1	1	± 0.3 %	± 0.3 %
Response Time	0.8	Rectangular	√3	1	1	± 0.5 %	± 0.5 %
Integration Time	2.6	Rectangular	√3	1	1	± 1.5 %	± 1.5 %
RF Ambient Noise	3.0	Rectangular	√3	1	1	± 1.7 %	± 1.7 %
RF Ambient Reflections	3.0	Rectangular	√3	1	1	± 1.7 %	± 1.7 %
Probe Positioner	0.8	Rectangular	√3	1	1	± 0.5 %	± 0.5 %
Probe Positioning	9.9	Rectangular	√3	1	1	± 5.7 %	± 5.7 %
Max. SAR Eval.	4.0	Rectangular	√3	1	1	± 2.3 %	± 2.3 %
Test Sample Related							
Device Positioning	2.9	Normal	1	1	1	± 2.9 %	± 2.9 %
Device Holder	3.6	Normal	1	1	1	± 3.6 %	± 3.6 %
Power Drift	5.0	Rectangular	√3	1	1	± 2.9 %	± 2.9 %
Phantom and Setup							
Phantom Uncertainty	4.0	Rectangular	√3	1	1	± 2.3 %	± 2.3 %
Liquid Conductivity (Target)	5.0	Rectangular	√3	0.64	0.43	± 1.8 %	± 1.2 %
Liquid Conductivity (Meas.)	2.5	Normal	1	0.64	0.43	± 1.6 %	± 1.1 %
Liquid Permittivity (Target)	5.0	Rectangular	√3	0.6	0.49	± 1.7 %	± 1.4 %
Liquid Permittivity (Meas.)	2.5	Normal	1	0.6	0.49	± 1.5 %	± 1.2 %
Combined Standard Uncertainty						± 12.8 %	± 12.6 %
Coverage Factor for 95 %						K=2	
Expanded Uncertainty						± 25.6 %	± 25.2 %

Table 16.2. Uncertainty Budget for frequency range 3 GHz to 6 GHz

16. *References*

[1]   FCC 47 CFR Part 2 "Frequency Allocations and Radio Treaty Matters; General Rules and Regulations"

[2]   ANSI/IEEE Std. C95.1-1992, "IEEE Standard for Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 kHz to 300 GHz", September 1992

[3]   IEEE Std. 1528-2003, "Recommended Practice for Determining the Peak Spatial-Average Specific Absorption Rate (SAR) in the Human Head from Wireless Communications Devices: Measurement Techniques", December 2003

[4]   SPEAG DASY System Handbook

[5]   FCC KDB 248227 D01 v02r01, "SAR Guidance for IEEE 802.11 (WiFi) Transmitters", Jun 2015.

[6]   FCC KDB 447498 D01 v05r02, "Mobile and Portable Device RF Exposure Procedures and Equipment Authorization Policies", Feb 2014

[7]   FCC KDB 648474 D04 v01r02, "SAR Evaluation Considerations for Wireless Handsets", Dec 2013.