



**FCC 47 CFR Parts 1 & 2
Published RF Exposure KDB Procedures
IEEE Std 1528-2003 and IEEE 1528a-2005**

SAR EVALUATION REPORT

For
2.4GHz Body-Worn Transceiver

**Model: 6110-414070
FCC ID: X7J-A10051702**

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1. Attestation of Test Results

Applicant	Walt Disney Parks and Resorts U.S., Inc.			
DUT description	2.4GHz Body-Worn Transceiver			
Model	6110-414070			
Test device is	An identical prototype			
Device category	Portable			
Exposure category	General Population/Uncontrolled Exposure			
Date tested	09/30/2013 - 10/01/2013			
The highest reported SAR values	RF exposure condition	Licensed	DTS	UNII
	Body	N/A W/kg	0.302 W/kg (2.4GHz)	N/A W/kg
	Simultaneous Transmission	N/A W/kg	N/A W/kg	N/A W/kg
Applicable Standards	FCC 47 CFR Parts 1 & 2 Published RF Exposure KDB Procedures, and TCB workshop updates IEEE Std 1528-2003 and IEEE Std 1528a-2005			
Test Results	Pass			

UL Verification Services Inc. tested the above equipment in accordance with the requirements set forth in the above standards. All indications of Pass/Fail in this report are opinions expressed by UL Verification Services Inc. based on interpretations and/or observations of test results. Measurement Uncertainties were not taken into account and are published for informational purposes only. The test results show that the equipment tested is capable of demonstrating compliance with the requirements as documented in this report.

Note: The results documented in this report apply only to the tested sample, under the conditions and modes of operation as described herein. This document may not be altered or revised in any way unless done so by UL Verification Services Inc. and all revisions are duly noted in the revisions section. Any alteration of this document not carried out by UL Verification Services Inc. will constitute fraud and shall nullify the document. This report must not be used by the client to claim product certification, approval, or endorsement by NVLAP, NIST, any agency of the Federal Government, or any agency of any government (NIST Handbook 150, Annex A). This report is written to support regulatory compliance of the applicable standards stated above.

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2. Test Methodology

The tests documented in this report were performed in accordance with FCC 47 CFR Parts 1 & 2, IEEE STD 1528-2003, IEEE Std 1528a-2005, the following FCC Published RF exposure KDB procedures and TCB workshop updates:

- KDB 447498 D01 General RF Exposure Guidance v05r01
- KDB 865664 D01 SAR measurement 100 MHz to 6 GHz v01r01
- KDB 865664 D02 SAR Reporting v01r01
- KDB 690783 D01 SAR Listings on Grants v01r03

3. Facilities and Accreditation

The test sites and measurement facilities used to collect data are located at 47173 Benicia Street, Fremont, California, USA.

UL Verification Services Inc. is accredited by NVLAP, Laboratory Code 200065-0. The full scope of accreditation can be viewed at <http://www.ccsemc.com>.

4. Calibration and Uncertainty

4.1. Measuring Instrument Calibration

The measuring equipment used to perform the tests documented in this report has been calibrated in accordance with the manufacturers' recommendations, and is traceable to recognized national standards.

Tissue Dielectric Properties

Name of Equipment	Manufacturer	Type/Model	Serial No.	Cal. Due Date
Network Analyzer	Agilent	8753ES	MY40000980	2/20/2014
Dielectric Probe kit	SPEAG	DAK-3.5	1103	2/5/2014
Thermometer	Control Company	4242	122529163	9/19/2014

System Performance Check

Name of Equipment	Manufacturer	Type/Model	Serial No.	Cal. Due Date
Synthesized Signal Generator	HP	8665B	3744A01084	5/7/2014
Power Meter	HP	437B	3125U12345	7/29/2014
Power Sensor	HP	8481A	1926A27048	7/29/2014
Amplifier	MITEQ	AMF-4D-00400600-50-30P	1620606	N/A
Directional coupler	Werlatone	C8060-102	2141	N/A
DC Power Supply	AMETEK	XHR60-18	1318A00530	N/A
Thermometer	EXTECH	445703	T35480662	3/19/2014
E-Field Probe	SPEAG	EX3DV4	3902	7/12/2014
Data Acquisition Electronics	SPEAG	DAE4	1377	7/15/2014
System Validation Dipole	SPEAG	D2450V2	706	5/29/2014

Others

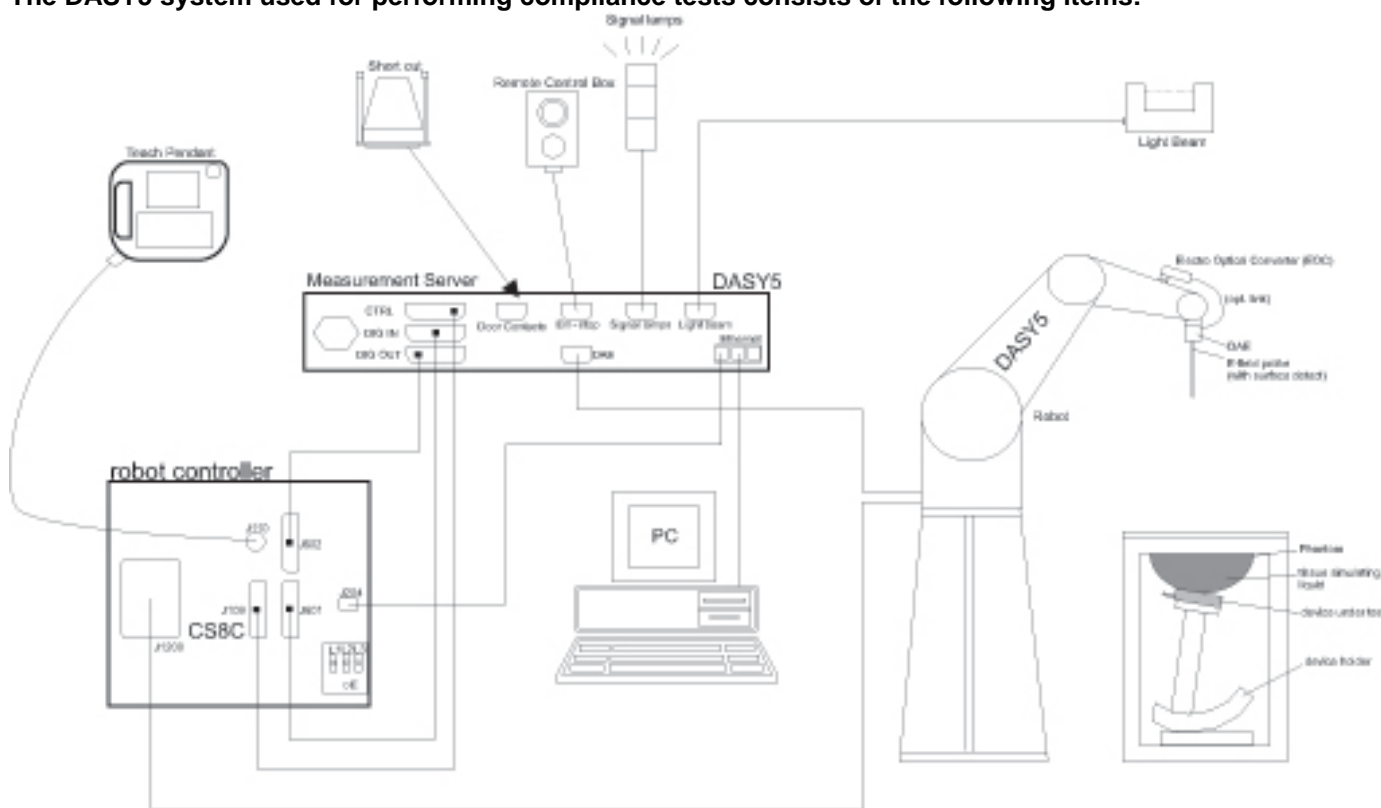
Name of Equipment	Manufacturer	Type/Model	Serial No.	Cal. Due Date
Power Meter	Agilent	N1912A	MY53040016	4/4/2014
Power Sensor	Agilent	N1921A	MY52020011	5/13/2014

4.2. Measurement Uncertainty

Per KDB 865664 D01 SAR Measurement 100 MHz to 6 GHz v01r01 Section 2.8.1., when the highest measured 1-g SAR within a frequency band is < 1.5 W/kg, the extensive SAR measurement uncertainty analysis described in IEEE Std 1528-2003 is not required in SAR reports submitted for equipment approval.

5. Measurement System Description and Setup

The DASY5 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.

6. SAR Measurement Procedure

6.1. Normal SAR Measurement Procedure

Step 1: 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. The minimum distance of probe sensors to surface is 2.1 mm. This distance cannot be smaller than the distance of sensor calibration points to probe tip as defined in the probe properties.

Step 2: 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 locations even in relatively coarse grids. When an Area Scan has measured all reachable points, it computes the field maximal found in the scanned area, within a range of the global maximum. The range (in dB) 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 KDB 865664 D01 SAR Measurement 100 MHz to 6 GHz v01r01

	≤ 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	$30^\circ \pm 1^\circ$	$20^\circ \pm 1^\circ$
Maximum area scan spatial resolution: $\Delta x_{\text{Area}}, \Delta y_{\text{Area}}$	≤ 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.	

Step 3: Zoom Scan

Zoom Scans are used to assess the peak spatial SAR values within a cubic averaging volume containing 1 g and 10 g of simulated tissue. The Zoom Scan measures points (refer to table below) within a cube whose 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 g and 10 g and displays these values next to the job's label.

Zoom Scan Parameters extracted from KDB 865664 D01 SAR Measurement 100 MHz to 6 GHz v01r01

			≤ 3 GHz	> 3 GHz
Maximum zoom scan spatial resolution: $\Delta x_{\text{Zoom}}, \Delta y_{\text{Zoom}}$			≤ 2 GHz: ≤ 8 mm 2 – 3 GHz: ≤ 5 mm*	3 – 4 GHz: ≤ 5 mm* 4 – 6 GHz: ≤ 4 mm*
Maximum zoom scan spatial resolution, normal to phantom surface	uniform grid: $\Delta z_{\text{Zoom}}(n)$		≤ 5 mm	3 – 4 GHz: ≤ 4 mm 4 – 5 GHz: ≤ 3 mm 5 – 6 GHz: ≤ 2 mm
	graded grid	$\Delta z_{\text{Zoom}}(1)$: between 1 st two points closest to phantom surface	≤ 4 mm	3 – 4 GHz: ≤ 3 mm 4 – 5 GHz: ≤ 2.5 mm 5 – 6 GHz: ≤ 2 mm
		$\Delta z_{\text{Zoom}}(n>1)$: between subsequent points	$\leq 1.5 \cdot \Delta z_{\text{Zoom}}(n-1)$	
Minimum zoom scan volume	x, y, z		≥ 30 mm	3 – 4 GHz: ≥ 28 mm 4 – 5 GHz: ≥ 25 mm 5 – 6 GHz: ≥ 22 mm
Note: δ is the penetration depth of a plane-wave at normal incidence to the tissue medium; see draft standard IEEE P1528-2011 for details.				
* When zoom scan is required and the <i>reported</i> SAR from the area scan based 1-g SAR estimation procedures of KDB 447498 is ≤ 1.4 W/kg, ≤ 8 mm, ≤ 7 mm and ≤ 5 mm zoom scan resolution may be applied, respectively, for 2 GHz to 3 GHz, 3 GHz to 4 GHz and 4 GHz to 6 GHz.				

Step 4: Power drift measurement

The Power Drift Measurement measures the field at the same location as the most recent power reference measurement within the same procedure, and with the same settings. The Power Drift Measurement gives the field difference in dB from the reading conducted within the last Power Reference Measurement. This allows a user to monitor the power drift of the device under test within a batch process. The measurement procedure is the same as Step 1.

Step 5: Z-Scan (FCC only)

The Z Scan measures points along a vertical straight line. The line runs along the Z-axis of a one-dimensional grid. In order to get a reasonable extrapolation the extrapolated distance should not be larger than the step size in Z-direction.

6.2. Volume Scan Procedures

Step 1: Repeat Step 1-4 in Section 6.1

Step 2: Volume Scan

Volume Scans are used to assess peak SAR and averaged SAR measurements in largely extended 3-dimensional volumes within any phantom. This measurement does not need any previous area scan. The grid can be anchored to a user specific point or to the current probe location.

Step 3: Power drift measurement

The Power Drift Measurement measures the field at the same location as the most recent power reference measurement within the same procedure, and with the same settings. The Power Drift Measurement gives the field difference in dB from the reading conducted within the last Power Reference Measurement. This allows a user to monitor the power drift of the device under test within a batch process. The measurement procedure is the same as Step 1.

7. Device Under Test

7.1. General Information

Model 6110-414070 is a 2.4GHz body-worn transceiver	
Air-interface	2.4GHz QPSK modulation 5MBPS 4MHz Bandwidth
RF Exposure Condition(s)	Body Worn with headset attached.
Device dimension	Overall (Length x Width): 76.5mm x 83.0mm Overall Diagonal: 114.7mm
Battery Options	External battery connected via a power bus

7.2. Wireless Technologies

Wireless Technology and Frequency Bands	2.4 GHz
Mode	QPSK
Duty Cycle	100%

7.3. Simultaneous Transmission Condition

The DUT does not support simultaneous transmission.

7.4. SAR test rationale

The DUT is intended to be body worn using a purpose built harness. The DUT can only be installed into the harness with the rear facing the user. Testing was therefore restricted to the rear only.

Although the harness provides some separation between the user and the DUT testing was performed at 0mm separation distance.

8. RF Output Power Measurement

8.1. 2.4 GHz QPSK

Target powers are absolute maximums.

Output Power	QPSK (dBm)		
	Low	Mid	High
Target	20.1	19.5	18.9

Measured Results

Band (GHz)	Mode	Data Rate	Ch	Freq. (MHz)	Conducted Avg Power		SAR Test (Yes/No)
					(dBm)	(mW)	
2.4	QPSK	MBPS	Low	2406	18.3	67.61	Yes
			Mid	2442	17.6	57.54	
			High	2474	16.9	48.98	

9. Exposure Conditions

9.1. Standalone SAR Test Exclusion Considerations

The DUT is intended for body worn use only. It will be mounted into a harness. The harness is designed so that the DUT can only be installed with the rear facing the user.

9.1.1. Required Test Configurations

Test Configurations	QPSK
Rear	Yes
Front	No
Edge 1	No
Edge 2	No
Edge 3	No
Edge 4	No

10. Tissue Dielectric Properties

IEEE Std 1528-2003 Table 2

Target Frequency (MHz)	Head	
	ϵ_r	σ (S/m)
300	45.3	0.87
450	43.5	0.87
835	41.5	0.90
900	41.5	0.97
1450	40.5	1.20
1800 – 2000	40.0	1.40
2450	39.2	1.80
2600	39.0	1.96
3000	38.5	2.40

FCC KDB 865664 D01 SAR Measurement 100 MHz to 6 GHz v01r01

Target Frequency (MHz)	Head		Body	
	ϵ_r	σ (S/m)	ϵ_r	σ (S/m)
150	52.3	0.76	61.9	0.80
300	45.3	0.87	58.2	0.92
450	43.5	0.87	56.7	0.94
835	41.5	0.90	55.2	0.97
900	41.5	0.97	55.0	1.05
915	41.5	0.98	55.0	1.06
1450	40.5	1.20	54.0	1.30
1610	40.3	1.29	53.8	1.40
1800 – 2000	40.0	1.40	53.3	1.52
2450	39.2	1.80	52.7	1.95
3000	38.5	2.40	52.0	2.73
5000	36.2	4.45	49.3	5.07
5100	36.1	4.55	49.1	5.18
5200	36.0	4.66	49.0	5.30
5300	35.9	4.76	48.9	5.42
5400	35.8	4.86	48.7	5.53
5500	35.6	4.96	48.6	5.65
5600	35.5	5.07	48.5	5.77
5700	35.4	5.17	48.3	5.88
5800	35.3	5.27	48.2	6.00

10.1. Composition of Ingredients for the Tissue Material Used in the SAR Tests

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.

Ingredients (% by weight)	Frequency (MHz)									
	450		835		915		1900		2450	
Tissue Type	Head	Body	Head	Body	Head	Body	Head	Body	Head	Body
Water	38.56	51.16	41.45	52.4	41.05	56.0	54.9	40.4	62.7	73.2
Salt (NaCl)	3.95	1.49	1.45	1.4	1.35	0.76	0.18	0.5	0.5	0.04
Sugar	56.32	46.78	56.0	45.0	56.5	41.76	0.0	58.0	0.0	0.0
HEC	0.98	0.52	1.0	1.0	1.0	1.21	0.0	1.0	0.0	0.0
Bactericide	0.19	0.05	0.1	0.1	0.1	0.27	0.0	0.1	0.0	0.0
Triton X-100	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	36.8	0.0
DGBE	0.0	0.0	0.0	0.0	0.0	0.0	44.92	0.0	0.0	26.7
Dielectric Constant	43.42	58.0	42.54	56.1	42.0	56.8	39.9	54.0	39.8	52.5
Conductivity (S/m)	0.85	0.83	0.91	0.95	1.0	1.07	1.42	1.45	1.88	1.78

Salt: 99+% Pure Sodium Chloride

Sugar: 98+% Pure Sucrose

Water: De-ionized, 16 MΩ+ resistivity

HEC: Hydroxyethyl Cellulose

DGBE: 99+% Di(ethylene glycol) butyl ether, [2-(2-butoxyethoxy)ethanol]

Triton X-100 (ultra pure): Polyethylene glycol mono [4-(1,1, 3, 3-tetramethylbutyl)phenyl]ether

Simulating Liquids for 5 GHz, Manufactured by SPEAG

Ingredients	(% by weight)
Water	78
Mineral oil	11
Emulsifiers	9
Additives and Salt	2

10.2. Tissue Dielectric Parameter Check Results

The temperature of the tissue-equivalent medium used during measurement must also be within 18°C to 25°C and within $\pm 2^\circ\text{C}$ of the temperature when the tissue parameters are characterized.

The dielectric parameters must be measured before the tissue-equivalent medium is used in a series of SAR measurements. The parameters should be re-measured after each 3 – 4 days of use; or earlier if the dielectric parameters can become out of tolerance; for example, when the parameters are marginal at the beginning of the measurement series.

Tissue dielectric parameters were measured at the low, middle and high frequency of each operating frequency range of the test device.

LAB 3

Date	Freq. (MHz)	Liquid Parameters			Measured	Target	Delta (%)	Limit \pm (%)
9/30/2013	Body 2450	e'	50.9100	Relative Permittivity (ϵ_r):	50.91	52.70	-3.40	5
		e"	14.8400	Conductivity (σ):	2.02	1.95	3.67	5
	Body 2410	e'	51.0900	Relative Permittivity (ϵ_r):	51.09	52.76	-3.16	5
		e"	14.6600	Conductivity (σ):	1.96	1.91	2.99	5
	Body 2475	e'	50.8000	Relative Permittivity (ϵ_r):	50.80	52.67	-3.55	5
		e"	14.9500	Conductivity (σ):	2.06	1.99	3.64	5

11. System Performance Check

SAR system verification is required to confirm measurement accuracy, according to the tissue dielectric media, probe calibration points and other system operating parameters required for measuring the SAR of a test device. The system verification must be performed for each frequency band and within the valid range of each probe calibration point required for testing the device. The same SAR probe(s) and tissue-equivalent media combinations used with each specific SAR system for system verification must be used for device testing. When multiple probe calibration points are required to cover substantially large transmission bands, independent system verifications are required for each probe calibration point. A system verification must be performed before each series of SAR measurements using the same probe calibration point and tissue-equivalent medium. Additional system verification should be considered according to the conditions of the tissue-equivalent medium and measured tissue dielectric parameters, typically every three to four days when the liquid parameters are remeasured or sooner when marginal liquid parameters are used at the beginning of a series of measurements.

11.1. System Performance Check Measurement Conditions

- The measurements were performed in the flat section of the TWIN SAM or ELI phantom, shell thickness: 2.0 ± 0.2 mm (bottom plate) filled with Body or Head simulating liquid of the following parameters.
- The depth of tissue-equivalent liquid in a phantom must be ≥ 15.0 cm ± 0.5 cm for SAR measurements ≤ 3 GHz and ≥ 10.0 cm ± 0.5 cm for measurements > 3 GHz.
- The DASY system with an E-Field Probe was used for the measurements.
- The dipole was mounted on the small tripod so that the dipole feed point was positioned below the center marking of the flat phantom section and the dipole was oriented parallel to the body axis (the long side of the phantom). The standard measuring distance was 10 mm (above 1 GHz) and 15 mm (below 1 GHz) from dipole center to the simulating liquid surface.
- The coarse grid with a grid spacing of 15 mm was aligned with the dipole.
For 5 GHz band - The coarse grid with a grid spacing of 10 mm was aligned with the dipole.
- Special 7x7x7 (below 3 GHz) and/or 8x8x7 (above 3 GHz) fine cube was chosen for the cube.
- Distance between probe sensors and phantom surface was set to 3 mm.
For 5 GHz band - Distance between probe sensors and phantom surface was set to 2.5 mm
- The dipole input power (forward power) was 100 mW.
- The results are normalized to 1 W input power.

11.2. System Performance Check Measurement Conditions

The reference SAR values can be obtained from the calibration certificate of system validation dipoles

System Dipole	Serial No.	Cal. Date	Freq. (MHz)	Target SAR Values (mW/g)		
				1g/10g	Head	Body
D2450V2	706	05/29/2013	2450	1g	53.7	49.9
				10g	25.0	23.3

11.3. System Performance Check Results

The 1-g and 10-g SAR measured with a reference dipole, using the required tissue-equivalent medium at the test frequency, must be within 10% of the manufacturer calibrated dipole SAR target.

LAB 3

Date Tested	System Dipole		T.S. Liquid	Measured Results			Target (Ref. Value)	Delta ±10 %	Est./Zoom Ratio ±3 %	Plot No.
	Type	Serial #		Area Scan	Zoom Scan	Normalize to 1 W				
9/30/2013	D2450V2	706	Body	1g	5.20	5.20	52.0	49.9	4.21	0.00
				10g	2.26	2.40	24.0	23.3	3.00	

12. SAR Test Results

12.1. QPSK

Test Position	Mode	Ch #.	Freq. (MHz)	Power (dBm)		1-g SAR (W/kg)		Plot No.	Note
				Tune-up limit	Meas.	Meas.	Scaled		
Rear	QPSK	Low	2406	20.1	18.3	0.198	0.300		
		Mid	2442	19.5	17.6	0.195	0.302	1	
		High	2474	18.9	16.9	0.183	0.287		

Note(s):

- Testing of other required channels within the operating mode of a frequency band is not required when the reported 1-g or 10-g SAR for the mid-band or highest output power channel is:
 - ≤ 0.8 W/kg or 2.0 W/kg, for 1-g or 10-g respectively, when the transmission band is ≤ 100 MHz
 - ≤ 0.6 W/kg or 1.5 W/kg, for 1-g or 10-g respectively, when the transmission band is between 100 MHz and 200 MHz
 - ≤ 0.4 W/kg or 1.0 W/kg, for 1-g or 10-g respectively, when the transmission band is ≥ 200 MHz

13. SAR Measurement Variability

In accordance with published RF Exposure KDB procedure 865664 D01 SAR measurement 100 MHz to 6 GHz v01. 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.

- 1) Repeated measurement is not required when the original highest measured SAR is < 0.80 W/kg; steps 2) through 4) do not apply.
- 2) When the original highest measured SAR is ≥ 0.80 W/kg, repeat that measurement once.
- 3) Perform a second repeated measurement only if the **ratio of largest to smallest SAR** for the original and first repeated measurements is > 1.20 or when the original or repeated measurement is ≥ 1.45 W/kg (~ 10% from the 1-g SAR limit).
- 4) Perform a third repeated measurement only if the original, first or second repeated measurement is ≥ 1.5 W/kg and the ratio of largest to smallest SAR for the original, first and second repeated measurements is > 1.20 .

13.1. The Highest Measured SAR Configuration in Each Frequency Band

Frequency Band (MHz)	Air Interface	Body
2400	QPSK	< 0.800 W/kg

13.2. Repeated Measurement Results

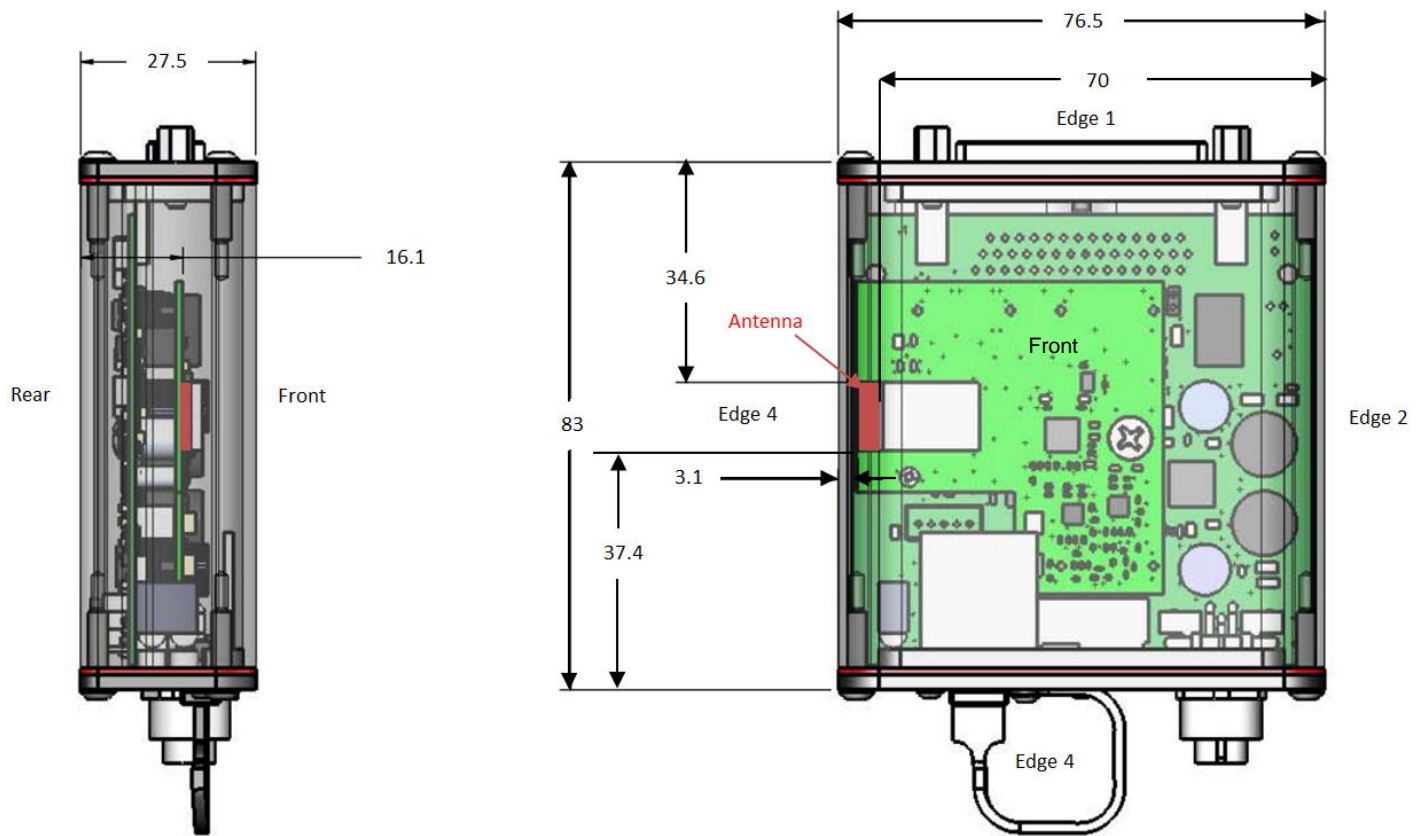
Not Applicable. Highest measured SAR is < 0.80 W/kg.

14. Appendixes

Refer to separated files for the following appendixes.

- 14.1. System Performance Check Plots**
- 14.2. Highest SAR Test Plot**
- 14.3. Calibration Certificate for E-Field Probe EX3DV4 - SN 3902**
- 14.4. Calibration Certificate for D2450V2 - SN 706**

16. Antenna Dimensions & Separation Distances



Dimensions in mm