



SAR EVALUATION REPORT

IEEE Std 1528-2013

For
BLUETOOTH EARBUD

FCC ID: BCG-A2031
Model Name: A2031

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Prepared for
APPLE INC.
1 APPLE PARK WAY
CUPERTINO, CA 95014

Prepared by
UL VERIFICATION SERVICES INC.
47173 BENICIA STREET
FREMONT, CA 94538, U.S.A.
TEL: (510) 319-4000
FAX: (510) 661-0888



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REVISION HISTORY

Rev.	Date	Revisions	Revised By
V1	3/15/2019	Initial Issue	--
V2	4/18/2019	Updated in accordance with TCB feedback	Devin Chang

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1. Attestation of Test Results

Applicant Name	APPLE INC.			
FCC ID	BCG-A2031			
Model Name	A2031			
Exposure Category	General Population/Uncontrolled Exposure			
Applicable Standards	FCC 47 CFR § 2.1093 Published RF exposure KDB procedures IEEE Std 1528-2013			
Exposure Category	SAR Limits (W/Kg)			
	Peak spatial-average(1g of tissue)		Extremities (hands, wrists, ankles, etc.) (10g of tissue)	
General population/Uncontrolled exposure	1.6		4	
RF Exposure Conditions	Equipment Class - Highest Reported SAR (W/kg)			
	PCE	DTS	NII	DSS
Head	N/A	N/A	N/A	0.071
Body	N/A	N/A	N/A	0.501
Date Tested	3/15/2019 to 3/15/2019			
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.				
Approved & Released By:		Prepared By:		
				
Devin Chang Senior Test Engineer UL Verification Services Inc.		Florencio Pesigan Laboratory Technician UL Verification Services Inc.		

2. Test Specification, Methods and Procedures

The tests documented in this report were performed in accordance with FCC 47 CFR § 2.1093, IEEE STD 1528-2013, the following FCC Published RF exposure [KDB](#) procedures:

- 447498 D01 General RF Exposure Guidance v06
- 447498 D03 Supplement C Cross-Reference v01
- 865664 D01 SAR measurement 100 MHz to 6 GHz v01r04
- 865664 D02 RF Exposure Reporting v01r02

In addition to the above, the following information was used:

- [TCB workshop](#) October 2016; RF Exposure Procedures (Bluetooth Duty Factor)
- [TCB workshop](#) October 2016; RF Exposure Procedures (DUT Holder Perturbations)

3. Facilities and Accreditation

The test sites and measurement facilities used to collect data are located at

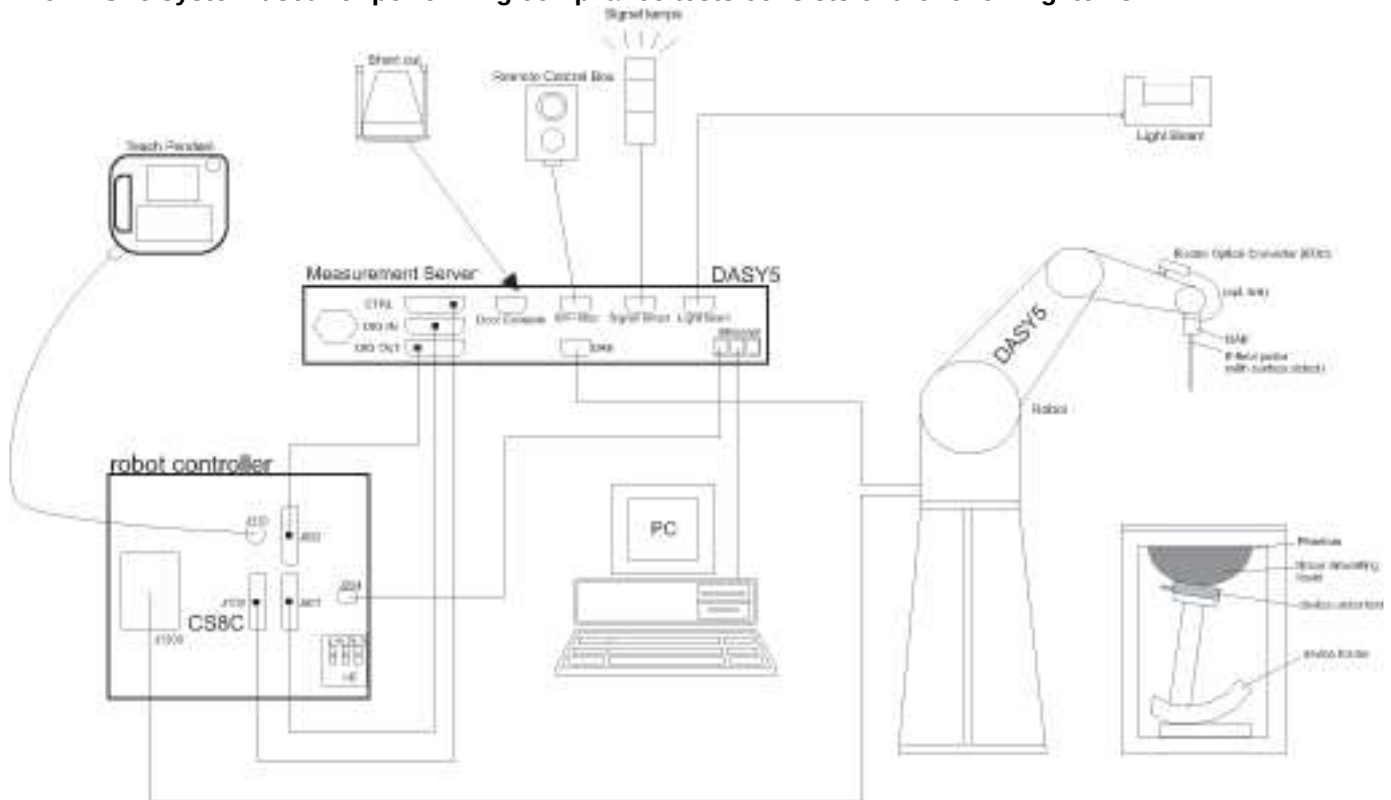
47173 Benicia Street	47266 Benicia Street
SAR Lab A	SAR Lab 1
SAR Lab B	SAR Lab 2
SAR Lab C	SAR Lab 3
SAR Lab D	SAR Lab 4
SAR Lab E	SAR Lab 5
SAR Lab F	
SAR Lab G	
SAR Lab H	

UL Verification Services Inc. is accredited by NVLAP, Laboratory Code 200065-0.

4. SAR Measurement System & Test Equipment

4.1. SAR Measurement System

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.

4.2. SAR Scan Procedures

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

	≤ 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: 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.	

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

			≤ 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 <u>reported</u> SAR from the <i>area scan based 1-g SAR estimation</i> 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.

4.3. Test Equipment

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.

Dielectric Property Measurements

Name of Equipment	Manufacturer	Type/Model	Serial No.	Cal. Due Date
Network Analyzer	R&S	ZNLE6	PRE0181650	7/16/2019
Dielectric Probe kit	SPEAG	DAK-3.5	1082	9/11/2019
Shorting block	SPEAG	DAK-3.5 Short	SM DAK 200 DA	9/11/2019
Thermometer	Traceable Calibration Control Co.	15-1078-179	150378159	6/6/2019

System Check

Name of Equipment	Manufacturer	Type/Model	Serial No.	Cal. Due Date
Signal Generator	Rhode & Schwarz	SMB100A	180970-zC	2/13/2020
Power Sensor	Rhode & Schwarz	NRP18A	100994-RE	2/15/2020

Lab Equipment

Name of Equipment	Manufacturer	Type/Model	Serial No.	Cal. Due Date
E-Field Probe (SAR Lab 2)	SPEAG	EX3DV4	3686	8/28/2019
E-Field Probe (SAR Lab 4)	SPEAG	EX3DV4	7356	4/24/2019
Data Acquisition Electronics (SAR Lab 2)	SPEAG	DAE4	1545	4/13/2019
Data Acquisition Electronics (SAR Lab 4)	SPEAG	DAE4	1547	5/3/2019
System Validation Dipole	SPEAG	D2450V2	706	5/18/2019
Thermometer	Fisherbrand	281 482-1714	181062309	2/21/2020

Other

Name of Equipment	Manufacturer	Type/Model	Serial No.	Cal. Due Date
Power Meter	Agilent	N1912A	MY55196015	1/29/2020
Power Sensor	Agilent	N1921A	MY52270022	2/6/2020

5. Measurement Uncertainty

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

Therefore, the measurement uncertainty is not required.

6. Device Under Test (DUT) Information

6.1. DUT Description

A2031 is a Bluetooth earbud for the left ear. It has an integral battery, microphone and antenna. It can charge via bottom contacts and with charge case. It is designed to work in conjunction with right earbud, A2032.

Device Dimension	Overall (Length x Width x Height): 16.5 mm x 18 mm x 40.5 mm This is a Small device (When the factor is smaller than 9 cm x 5 cm)
Battery Options	The rechargeable battery is not user accessible.

6.2. Wireless Technologies

Wireless technologies	Frequency bands	Operating mode	Duty Cycle used for SAR testing
Bluetooth	2.4 GHz	Version 5.0 LE	100% (DH5)

6.3. Maximum Output Power from Tune-up Procedure

KDB 447498 sec.4.1.(3) at the maximum rated output power and within the tune-up tolerance range specified for the product, but not more than 2 dB lower than the maximum tune-up tolerance limit

RF Air interface	Max. RF Output Power (dBm)
Bluetooth	12.50
Bluetooth EDR	10.00
Bluetooth LE	10.00

7. RF Exposure Conditions (Test Configurations)

Refer to Appendix A for the specific details of the antenna-to-antenna and antenna-to-edge(s) distances.

Wireless technologies	RF Exposure Conditions	DUT-to-User Separation	Test Position	Antenna-to-edge/surface	SAR Required	Note
Bluetooth	Head	0 mm	Left Touch	< 25mm	Yes	
Bluetooth	Body	0 mm	Left Flat	< 25mm	Yes	

8. Dielectric Property Measurements & System Check

8.1. Dielectric Property Measurements

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.

The dielectric constant (ϵ_r) and conductivity (σ) of typical tissue-equivalent media recipes are expected to be within $\pm 5\%$ of the required target values; but for SAR measurement systems that have implemented the SAR error compensation algorithms documented in IEEE Std 1528-2013, to automatically compensate the measured SAR results for deviations between the measured and required tissue dielectric parameters, the tolerance for ϵ_r and σ may be relaxed to $\pm 10\%$. This is limited to frequencies $\leq 3\text{ GHz}$.

Tissue Dielectric Parameters

FCC KDB 865664 D01 SAR Measurement 100 MHz to 6 GHz

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

IEEE Std 1528-2013

Refer to Table 3 within the IEEE Std 1528-2013

Dielectric Property Measurements Results:

SAR Lab	Date	Band (MHz)	Tissue Type	Frequency (MHz)	Relative Permittivity (ϵ_r)			Conductivity (σ)		
					Measured	Target	Delta $\pm 5\%$	Measured	Target	Delta $\pm 5\%$
2	3/15/2019	2450	Body	2450	51.65	52.70	-1.99	2.04	1.95	4.51
				2400	51.77	52.77	-1.90	1.98	1.90	4.16
				2480	51.59	52.66	-2.04	2.07	1.99	3.86
4	3/15/2019	2450	Head	2450	37.78	39.20	-3.62	1.81	1.80	0.50
				2400	37.82	39.30	-3.76	1.77	1.75	1.05
				2480	37.77	39.16	-3.55	1.83	1.83	-0.24

8.2. System 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 re-measured or sooner when marginal liquid parameters are used at the beginning of a series of measurements.

System Performance Check Measurement Conditions:

- The measurements were performed in the flat section of the TWIN SAM or ELI phantom, shell thickness: 2.0 $\pm$ 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 $\geq$ 15.0 cm for SAR measurements $\leq$ 3 GHz and $\geq$ 10.0 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.

System 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 $\pm 10\%$ of the manufacturer calibrated dipole SAR target. Refer to Appendix B for the SAR System Check Plots.

SAR Lab	Date	Tissue Type	Dipole Type_Serial #	Dipole Cal. Due Date	Measured Results for 1g SAR				Measured Results for 10g SAR				Plot No.
					Zoom Scan to 100 mW	Normalize to 1W	Target (Ref. Value)	Delta $\pm 10\%$	Zoom Scan to 100 mW	Normalize to 1W	Target (Ref. Value)	Delta $\pm 10\%$	
2	3/15/2019	Body	D2450V2 SN:706	5/18/2019	5.400	54.00	50.60	6.72	2.440	24.40	23.70	2.95	1,2
4	3/15/2019	Head	D2450V2 SN:706	5/18/2019	5.370	53.70	52.60	2.09	2.490	24.90	24.60	1.22	3,4

9. Conducted Output Power Measurements

9.1. Bluetooth

Bluetooth Measured Results

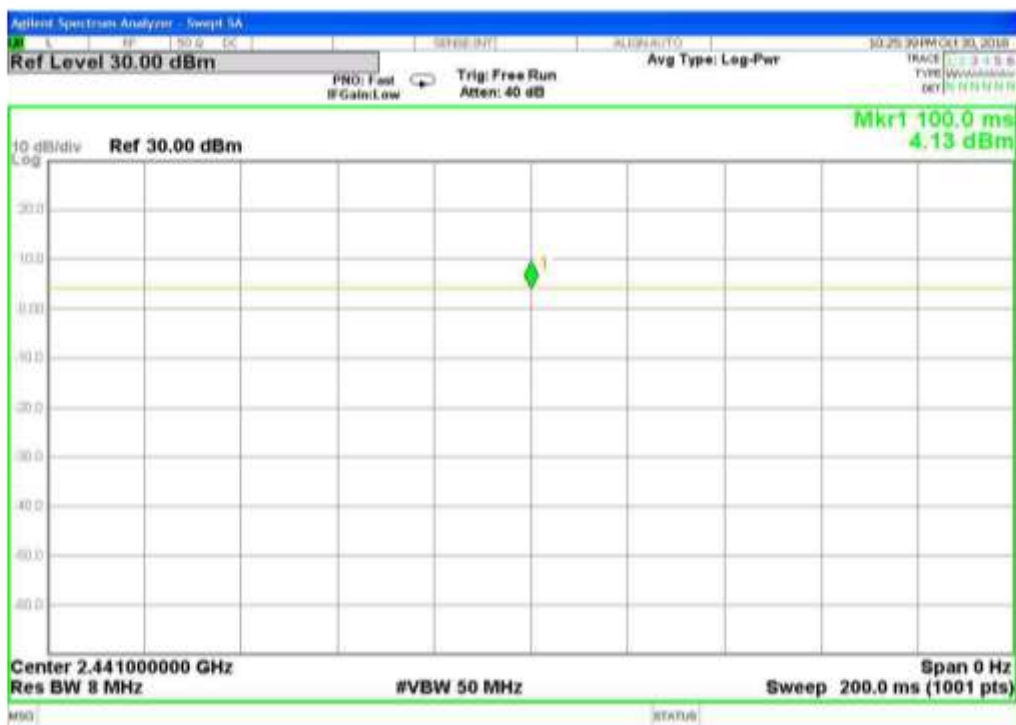
From October 2016 TCB workshop, this device power and SAR measured is performed with test software, the duty cycle is 100%.

SAR measurement is not required for the QPSK, 8PSK, and BLE. When the secondary mode is $\leq \frac{1}{4}$ dB higher than the primary mode.

Band	Mode	Ch #	Freq. (MHz)	Average Power (dBm)		
				Meas Pwr	Tune-up	SAR Test (Yes/No)
2.4 GHz	GFSK	0	2402	12.50	12.50	Yes
		39	2441	12.50	12.50	
		78	2480	12.50	12.50	

Duty Cycle plots

GFSK



10. Measured and Reported (Scaled) SAR Results

SAR Test Reduction criteria are as follows:

- Reported SAR(W/kg) for WWAN = Measured SAR *Tune-up Scaling Factor
- Reported SAR(W/kg) for Wi-Fi and Bluetooth = Measured SAR * Tune-up scaling factor * Duty Cycle scaling factor
- Duty Cycle scaling factor = 1 / Duty cycle (%)

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 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

10.1. Bluetooth

RF Exposure Conditions	Mode	Dist. (mm)	Test Position	Ch #.	Freq. (MHz)	Duty Cycle	Power (dBm)		1-g SAR (W/kg)		10-g SAR (W/kg)		Plot No.
							Tune-up Limit	Meas.	Meas.	Scaled	Meas.	Scaled	
Head	GFSK	0	Left Touch	39	2441	100.0%	12.50	12.50	0.071	0.071	0.035	0.035	1
Body			Left Flat	39	2441	100.0%	12.50	12.50	0.501	0.501	0.143	0.143	2

Notes:

SAR Testing was performed on the Flat Phantom for normal use for Head. Additional SAR Testing was performed on the location closest to the Antenna (Rear of the Device) of similar configuration to demonstrate compliance. This was reported as the highest SAR.

11. SAR Measurement Variability

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

- Repeated measurement is not required when the original highest measured SAR is <0.8 or 2 W/kg (1-g or 10-g respectively); steps 2) through 4) do not apply.
- When the original highest measured SAR is ≥ 0.8 or 2 W/kg (1-g or 10-g respectively), repeat that measurement once.
- 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 3 (1-g or 10-g respectively) or when the original or repeated measurement is ≥ 1.45 or 3.6 W/kg (~ 10% from the 1-g or 10-g respective SAR limit).
- Perform a third repeated measurement only if the original, first, or second repeated measurement is ≥ 1.5 or 3.75 W/kg (1-g or 10-g respectively) and the ratio of largest to smallest SAR for the original, first and second repeated measurements is > 1.20 or 3 (1-g or 10-g respectively).

Frequency Band (MHz)	Air Interface	RF Exposure Conditions	Test Position	Repeated SAR (Yes/No)	Highest Measured SAR (W/kg)	First Repeated	
						Measured SAR (W/kg)	Largest to Smallest SAR Ratio
2400	BT	Body	Left Flat	No	0.501	N/A	N/A

Note(s):

Second Repeated Measurement is not required since the ratio of the largest to smallest SAR for the original and first repeated measurement is not > 1.20 or 3 (1-g or 10-g respectively).

12. Simultaneous Transmission SAR Analysis

N/A

Appendixes

Refer to separated files for the following appendixes.

Appendix A: SAR Setup Photos

Appendix B: SAR System Check Plots

Appendix C: SAR Highest Test Plots

Appendix D: SAR Tissue Ingredients

Appendix E: SAR Probe Certificates

Appendix F: SAR Dipole Certificates

END OF REPORT