



# ELEMENT MATERIALS TECHNOLOGY

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## SAR EVALUATION REPORT

**Applicant Name:**

Apple Inc.  
One Apple Park Way  
Cupertino, CA 95014 USA

**Date of Testing:**

07/23/2024 – 08/19/2024

**Test Report Issue Date:**

08/20/2024

**Test Site/Location:**

Element, Morgan Hill, CA, USA

**Document Serial No.:**

1C2405230026-01.BCG-R1

**FCC ID:****BCG-A3056****APPLICANT:****APPLE, INC.**

**DUT Type:** Wireless Earbud  
**Application Type:** Certification  
**FCC Rule Part(s):** CFR §2.1093  
**Model:** A3056

Equipment Class	Band & Mode	Tx Frequency	SAR	
			1g Head (W/kg)	1g Body-Worn (W/kg)
DSS/DTS	2.4 GHz Bluetooth	2402 - 2480 MHz	0.15	0.74
NII	NB U-NII 1	5157 - 5245 MHz	<0.1	1.03
NII	NB U-NII 3	5731 - 5844 MHz	0.11	1.18
6VL	NB U-NII 5	6108 - 6420 MHz	<0.1	0.39
Equipment Class	Band & Mode	Tx Frequency	APD (W/m <sup>2</sup> )	APD (W/m <sup>2</sup> )
6VL	NB U-NII 5	6108 - 6420 MHz	0.24	1.29
Equipment Class	Band & Mode	Tx Frequency	Reported PD (W/m <sup>2</sup> )	Reported PD (W/m <sup>2</sup> )
6VL	NB U-NII 5	6108 - 6420 MHz	0.35	1.45

Note: This revised Test Report supersedes and replaces the previously issued test report on the same subject device for the same type of testing as indicated. Please discard or destroy the previously issued test report(s) and dispose of it accordingly.

This wireless portable device has been shown to be capable of compliance for localized specific absorption rate (SAR) for uncontrolled environment/general population exposure limits specified in ANSI/IEEE C95.1-1992 and has been tested in accordance with the measurement procedures specified in Section 1.6 of this report; for North American frequency bands only.

I attest to the accuracy of data. All measurements reported herein were performed by me or were made under my supervision and are correct to the best of my knowledge and belief. I assume full responsibility for the completeness of these measurements and vouch for the qualifications of all persons taking them. Test results reported herein relate only to the item(s) tested.

RJ Ortanez

Executive Vice President



The SAR Tick is an initiative of the Mobile & Wireless Forum (MWF). While a product may be considered eligible, use of the SAR Tick logo requires an agreement with the MWF. Further details can be obtained by emailing: [sartick@mwfai.info](mailto:sartick@mwfai.info).

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# 1 DEVICE UNDER TEST

## 1.1 Device Overview

Band & Mode	Operating Modes	Tx Frequency
2.4 GHz Bluetooth	Data	2402 - 2480 MHz
NB U-NII 1	Data	5157 - 5245 MHz
NB U-NII 3	Data	5731 - 5844 MHz
NB U-NII 5	Data	6108 - 6420 MHz

## 1.2 Power Reduction for SAR

There is no power reduction used for any band/mode implemented in this device for SAR purposes.

## 1.3 Nominal and Maximum Output Power Specifications

This device operates using the following maximum and nominal output power specifications. SAR values were scaled to the maximum allowed power to determine compliance per KDB Publication 447498 D04v01.

### 1.3.1 Maximum Output Power

Mode / Band	Duty Cycle	Modulated Average (dBm)	
2.4 GHz Bluetooth BDR	34%	Maximum	<b>12.50</b>
		Nominal	<b>11.50</b>
2.4 GHz Bluetooth EDR	77%	Maximum	<b>9.50</b>
		Nominal	<b>8.50</b>
2.4 GHz Bluetooth HDR4/8	77%	Maximum	<b>9.50</b>
		Nominal	<b>8.50</b>
2.4 GHz Bluetooth HDRp4/8	100%	Maximum	<b>9.50</b>
		Nominal	<b>8.50</b>
2.4 Bluetooth LE1M	100%	Maximum	<b>10.50</b>
		Nominal	<b>9.50</b>
2.4 Bluetooth LE2M	15%	Maximum	<b>10.50</b>
		Nominal	<b>9.50</b>

Mode / Band	Duty Cycle	Modulated Average (dBm)	
NB UNII-1 BDR	34%	Maximum	<b>9.00</b>
		Nominal	<b>8.00</b>
NB UNII-1 HDR4/8 1-Slot	34%	Maximum	<b>9.00</b>
		Nominal	<b>8.00</b>
NB UNII-1 HDR4/8 3/5-Slot	77%	Maximum	<b>6.00</b>
		Nominal	<b>5.00</b>
NB UNII-1 HDRp4/8	100%	Maximum	<b>6.00</b>
		Nominal	<b>5.00</b>
NB UNII-1 LE2M	15%	Maximum	<b>10.00</b>
		Nominal	<b>9.00</b>

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Mode / Band	Duty Cycle	Modulated Average (dBm)	
NB UNII-3 BDR	34%	Maximum	<b>10.00</b>
		Nominal	<b>9.00</b>
NB UNII-3 HDR4/8 1-Slot	34%	Maximum	<b>9.50</b>
		Nominal	<b>8.50</b>
NB UNII-3 HDR4/8 3/5-Slot	77%	Maximum	<b>6.50</b>
		Nominal	<b>5.50</b>
NB UNII-3 HDRp4/8	100%	Maximum	<b>6.50</b>
		Nominal	<b>5.50</b>
NB UNII-3 LE2M	15%	Maximum	<b>11.00</b>
		Nominal	<b>10.00</b>

Mode / Band	Duty Cycle	Modulated Average (dBm)	
NB UNII-5 BDR	34%	Maximum	<b>-3.00</b>
		Nominal	<b>-4.00</b>
NB UNII-5 HDR4 1-Slot	34%	Maximum	<b>-0.50</b>
		Nominal	<b>-1.50</b>
NB UNII-5 HDR8 1-Slot	34%	Maximum	<b>2.00</b>
		Nominal	<b>1.00</b>
NB UNII-5 HDR4 3/5-Slot	77%	Maximum	<b>-0.50</b>
		Nominal	<b>-1.50</b>
NB UNII-5 HDR8 3/5-Slot	77%	Maximum	<b>2.00</b>
		Nominal	<b>1.00</b>
NB UNII-5 HDRp4	100%	Maximum	<b>-0.50</b>
		Nominal	<b>-1.50</b>
NB UNII-5 HDRp8	100%	Maximum	<b>2.00</b>
		Nominal	<b>1.00</b>
NB UNII-5 LE2M	15%	Maximum	<b>-3.00</b>
		Nominal	<b>-4.00</b>

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## 1.4 DUT Antenna Locations

Based on the expected use conditions, Head SAR was evaluated. Per manufacturer request, Body-Worn SAR was evaluated as an additional conservative SAR test condition. The antenna is located inside BCG-A3056 – which is a wireless Bluetooth earbud for the Left ear. A diagram showing the location of the device antenna can be found in the DUT Antenna Diagram & SAR Test Setup Photographs Appendix. More information about the configurations evaluated for SAR can be found in Section 4.2 and Section 4.3.

## 1.5 Simultaneous Transmission Capabilities

This Device does not support any Simultaneous transmission Scenarios.

## 1.6 Guidance Applied

- FCC KDB Publication 447498 D04v01 (General SAR Guidance)
- FCC KDB Publication 865664 D01v01r04, D02v01r02 (SAR Measurements up to 6 GHz)

## 1.7 Device Serial Numbers

Several samples with identical hardware were used to support SAR testing. The manufacturer has confirmed that the device(s) tested have the same physical, mechanical, and thermal characteristics and are within operational tolerances expected for production units. The serial numbers used for each test are indicated alongside the results in Section 9.

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## 2 INTRODUCTION

The FCC and Innovation, Science, and Economic Development Canada have adopted the guidelines for evaluating the environmental effects of radio frequency (RF) radiation in ET Docket 93-62 on Aug. 6, 1996, and Health Canada Safety Code 6 to protect the public and workers from the potential hazards of RF emissions due to FCC-regulated portable devices. [1]

The safety limits used for the environmental evaluation measurements are based on the criteria published by the American National Standards Institute (ANSI) for localized specific absorption rate (SAR) in IEEE/ANSI C95.1-1992 Standard for Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 kHz to 300 GHz [3] and Health Canada RF Exposure Guidelines Safety Code 6 [22]. The measurement procedure described in IEEE/ANSI C95.3-2002 Recommended Practice for the Measurement of Potentially Hazardous Electromagnetic Fields - RF and Microwave [4] is used for guidance in measuring the Specific Absorption Rate (SAR) due to the RF radiation exposure from the Equipment Under Test (EUT). These criteria for SAR evaluation are similar to those recommended by the International Committee for Non-Ionizing Radiation Protection (ICNIRP) in Biological Effects and Exposure Criteria for Radiofrequency Electromagnetic Fields," Report No. Vol 74. SAR is a measure of the rate of energy absorption due to exposure to an RF transmitting source. SAR values have been related to threshold levels for potential biological hazards.

### 2.1 SAR Definition

Specific Absorption Rate is defined as the time derivative (rate) of the incremental energy (dU) absorbed by (dissipated in) an incremental mass (dm) contained in a volume element (dV) of a given density ( $\rho$ ). It is also defined as the rate of RF energy absorption per unit mass at a point in an absorbing body (see Equation 2-1).

**Equation 2-1  
SAR Mathematical Equation**

$$SAR = \frac{d}{dt} \left( \frac{dU}{dm} \right) = \frac{d}{dt} \left( \frac{dU}{\rho dV} \right)$$

**SAR is expressed in units of Watts per Kilogram (W/kg).**

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

where:

$\sigma$  = conductivity of the tissue-simulating material (S/m)

$\rho$  = mass density of the tissue-simulating material (kg/m<sup>3</sup>)

E = Total RMS electric field strength (V/m)

NOTE: The primary factors that control rate of energy absorption were found to be the wavelength of the incident field in relation to the dimensions and geometry of the irradiated organism, the orientation of the organism in relation to the polarity of field vectors, the presence of reflecting surfaces, and whether conductive contact is made by the organism with a ground plane.[6]

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## 3 DOSIMETRIC ASSESSMENT

### 3.1 Measurement Procedure

The evaluation was performed using the following procedure compliant to FCC KDB Publication 865664 D01v01r04 and IEEE 1528-2013:

1. The SAR distribution at the exposed side of the head or body was measured at a distance no greater than 5.0 mm from the inner surface of the shell. The area covered the entire dimension of the device-head and body interface, and the horizontal grid resolution was determined per FCC KDB Publication 865664 D01v01r04 (See Table 3-3-1) and IEEE 1528-2013.
2. The point SAR measurement was taken at the maximum SAR region determined from Step 1 to enable the monitoring of SAR fluctuations/drifts during the 1g/10g cube evaluation. SAR at this fixed point was measured and used as a reference value.
3. Based on the area scan data, the peak of the region with maximum SAR was determined by spline interpolation. Around this point, a volume was assessed according to the measurement resolution and volume size requirements of FCC KDB Publication 865664 D01v01r04 (See Table 3-3-1) and IEEE 1528-2013. On the basis of this data set, the spatial peak SAR value was evaluated with the following procedure (see references or the cDASY6 manual online for more details):
  - a. SAR values at the inner surface of the phantom are extrapolated from the measured values along the line away from the surface with spacing no greater than that in Table 3-3-1. The extrapolation was based on a least-squares algorithm. A polynomial of the fourth order was calculated through the points in the z-axis (normal to the phantom shell).
  - b. After the maximum interpolated values were calculated between the points in the cube, the SAR was averaged over the spatial volume (1g or 10g) using a 3D-Spline interpolation algorithm. The 3D-spline is composed of three one-dimensional splines with the “Not a knot” condition (in x, y, and z directions). The volume was then integrated with the trapezoidal algorithm. One thousand points ( $10 \times 10 \times 10$ ) were obtained through interpolation, in order to calculate the averaged SAR.
  - c. All neighboring volumes were evaluated until no neighboring volume with a higher average value was found.
4. The SAR reference value, at the same location as step 2, was re-measured after the zoom scan was complete to calculate the SAR drift. If the drift deviated by more than 5%, the SAR test and drift measurements were repeated.

**Table 3-3-1**  
**Area and Zoom Scan Resolutions per FCC KDB Publication 865664 D01v01r04\***

Frequency	Maximum Area Scan Resolution (mm) ( $\Delta x_{\text{area}}, \Delta y_{\text{area}}$ )	Maximum Zoom Scan Resolution (mm) ( $\Delta x_{\text{zoom}}, \Delta y_{\text{zoom}}$ )	Maximum Zoom Scan Spatial Resolution (mm)			Minimum Zoom Scan Volume (mm) (x,y,z)
			Uniform Grid		Graded Grid	
			$\Delta z_{\text{zoom}}(n)$	$\Delta z_{\text{zoom}}(1)^*$	$\Delta z_{\text{zoom}}(n>1)^*$	
≤ 2 GHz	≤ 15	≤ 8	≤ 5	≤ 4	≤ 1.5* $\Delta z_{\text{zoom}}(n-1)$	≥ 30
2-3 GHz	≤ 12	≤ 5	≤ 5	≤ 4	≤ 1.5* $\Delta z_{\text{zoom}}(n-1)$	≥ 30
3-4 GHz	≤ 12	≤ 5	≤ 4	≤ 3	≤ 1.5* $\Delta z_{\text{zoom}}(n-1)$	≥ 28
4-5 GHz	≤ 10	≤ 4	≤ 3	≤ 2.5	≤ 1.5* $\Delta z_{\text{zoom}}(n-1)$	≥ 25
5-6 GHz	≤ 10	≤ 4	≤ 2	≤ 2	≤ 1.5* $\Delta z_{\text{zoom}}(n-1)$	≥ 22

\*Also compliant to IEEE 1528-2013 Table 6

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## 4 TEST CONFIGURATION POSITIONS

### 4.1 Device Holder

The device holder is made out of low-loss POM material having the following dielectric parameters: relative permittivity  $\epsilon = 3$  and loss tangent  $\delta = 0.02$ .

### 4.2 Positioning for Head

This device is a wireless Bluetooth earbud for the Left ear which is designed to be used in the ear canal. The antenna is located inside the earbud. SAR was evaluated with a separation distance of 0 mm between the earbud (the ear tip facing the phantom) and the flat phantom. The phantom is filled with head tissue equivalent medium.

### 4.3 Body-Worn Exposure Conditions

Per manufacturer request, Body-Worn SAR was evaluated as an additional conservative SAR test condition for the left earbud. The DUT was evaluated with a separation distance of 0 mm between the back side of the earbud and the flat phantom. The button side and antenna touching were additionally evaluated. The phantom is filled with head tissue equivalent medium.

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## 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. This 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.

**Table 5-1  
SAR Human Exposure Specified in ANSI/IEEE C95.1-1992 and Health Canada Safety Code 6**

HUMAN EXPOSURE LIMITS		
	UNCONTROLLED ENVIRONMENT <i>General Population</i> (W/kg) or (mW/g)	CONTROLLED ENVIRONMENT <i>Occupational</i> (W/kg) or (mW/g)
<b>Peak Spatial Average SAR</b> Head	1.6	8.0
<b>Whole Body SAR</b>	0.08	0.4
<b>Peak Spatial Average SAR</b> Hands, Feet, Ankle, Wrists, etc.	4.0	20

1. The Spatial Peak value of the SAR averaged over any 1 gram of tissue (defined as a tissue volume in the shape of a cube) and over the appropriate averaging time.
2. The Spatial Average value of the SAR averaged over the whole body.
3. The Spatial Peak value of the SAR averaged over any 10 grams of tissue (defined as a tissue volume in the shape of a cube) and over the appropriate averaging time.

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### 5.3 RF Exposure Limits for Frequencies Above 6 GHz

Per §1.1310 (d)(3), the MPE limits are applied for frequencies above 6 GHz. Power Density is expressed in units of W/m<sup>2</sup> or mW/cm<sup>2</sup>.

Peak Spatially Averaged Power Density was evaluated over a circular area of 4 cm<sup>2</sup> per interim FCC Guidance for near-field power density evaluations per October 2018 TCB Workshop notes.

**Table 6-2**  
**Human Exposure Limits Specified in FCC 47 CFR §1.1310**

<b>Human Exposure to Radiofrequency (RF) Radiation Limits</b>		
<b>Frequency Range [MHz]</b>	<b>Power Density [mW/cm<sup>2</sup>]</b>	<b>Average Time [Minutes]</b>
(A) Limits For Occupational / Controlled Environments		
1,500 – 100,000	5.0	6
(B) Limits For General Population / Uncontrolled Environments		
1,500 – 100,000	1.0	30

Note: 1.0 mW/cm<sup>2</sup> is 10 W/m<sup>2</sup>

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## 6 FCC MEASUREMENT PROCEDURES

### 6.1 Measured and Reported SAR

Per FCC KDB Publication 447498 D04v01, when SAR is not measured at the maximum power level allowed for production units, the results must be scaled to the maximum tune-up tolerance limit according to the power applied to the individual channels tested to determine compliance. For simultaneous transmission, the measured aggregate SAR must be scaled according to the sum of the differences between the maximum tune-up tolerance and actual power used to test each transmitter. When SAR is measured at or scaled to the maximum tune-up tolerance limit, the results are referred to as *reported* SAR. The highest *reported* SAR results are identified on the grant of equipment authorization according to procedures in KDB 690783 D01v01r03.

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## 7 RF CONDUCTED POWERS

### 7.1 Bluetooth/NB UNII Conducted Powers

Table 7-1  
Bluetooth Average RF Power

Frequency [MHz]	Modulation	Data Rate [Mbps]	Channel No.	Avg Conducted Power	
				[dBm]	[mW]
2402	LE1M	1.0	0	9.83	9.616
2441	LE1M	1.0	39	9.80	9.550
2480	LE1M	1.0	78	9.99	9.977

Table 7-2  
NB UNII Average RF Power

Type	Band	Frequency	Channel	Average
HDRp4	U-NII 1	5157	Low	5.29
		5201	Mid	5.14
		5245	High	4.85
HDRp4	U-NII 3	5731	Low	5.15
		5788	Mid	5.08
		5844	High	4.85
HDRp8	U-NII 5	6108	Low	1.38
		6186	Low-Mid	1.49
		6264	Mid	1.45
		6342	Mid-High	1.50
		6420	High	1.78

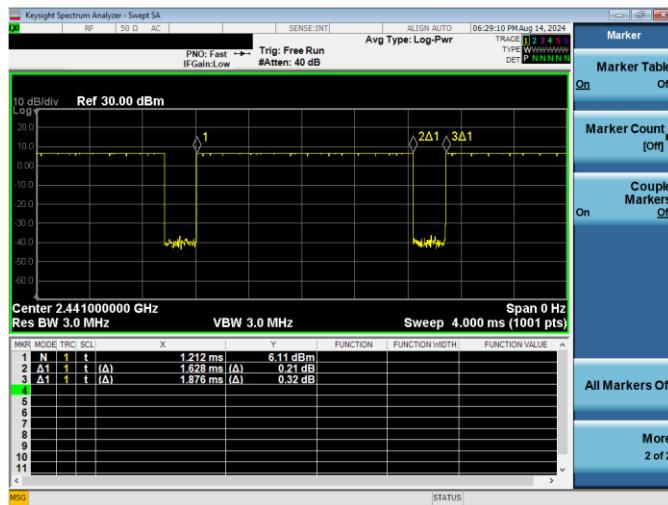
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## 7.2 Bluetooth/NB UNII Duty Cycle Plots

**Figure 7-1**  
**2.4 GHz Bluetooth Transmission Plot**



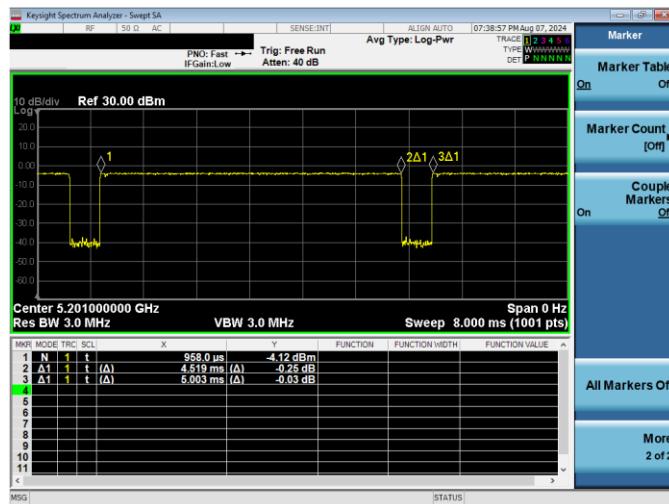
**Equation 7-1**  
**2.4 GHz Bluetooth Duty Cycle Calculation**

$$\text{Duty Cycle} = \frac{\text{Pulse Width}}{\text{Period}} * 100\% = \frac{1.628 \text{ ms}}{1.876 \text{ ms}} * 100\% = 86.78\%$$

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**Figure 7-2**  
**NB U-NII 1 Transmission Plot**



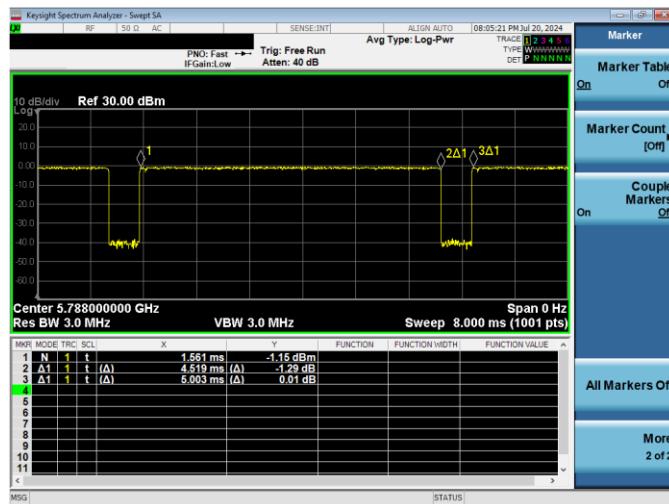
**Equation 7-2**  
**NB U-NII 1 Duty Cycle Calculation**

$$\text{Duty Cycle} = \frac{\text{Pulse Width}}{\text{Period}} * 100\% = \frac{4.519 \text{ ms}}{5.003 \text{ ms}} * 100\% = 90.33\%$$

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**Figure 7-3**  
**NB U-NII 3 Transmission Plot**



**Equation 7-3**  
**NB U-NII 3 Duty Cycle Calculation**

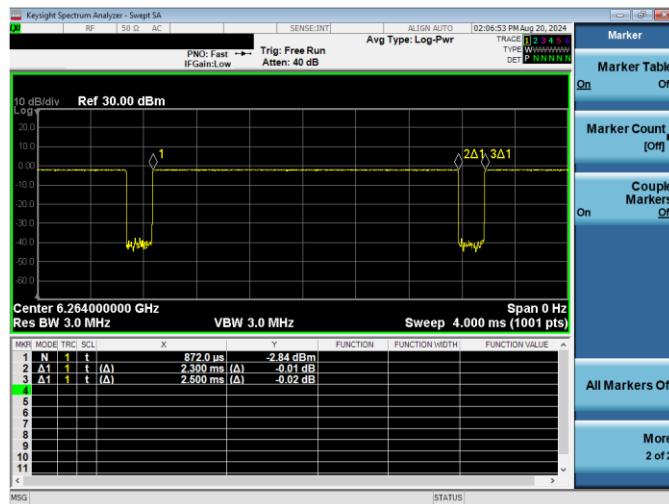
$$\text{Duty Cycle} = \frac{\text{Pulse Width}}{\text{Period}} * 100\% = \frac{4.519 \text{ ms}}{5.003 \text{ ms}} * 100\% = 90.33\%$$

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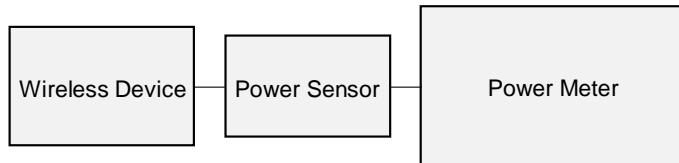
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**Figure 7-4**  
**NB U-NII 5 Transmission Plot**



**Equation 7-4**  
**NB U-NII 5 Duty Cycle Calculation**

$$\text{Duty Cycle} = \frac{\text{Pulse Width}}{\text{Period}} * 100\% = \frac{2.300 \text{ ms}}{2.500 \text{ ms}} * 100\% = 92.00\%$$



**Figure 7-5**  
**Power Measurement Setup**

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## 8 SYSTEM VERIFICATION

### 8.1 Tissue Verification

Table 8-1  
Measured Head Tissue Properties

Calibrated for Tests Performed on:	Tissue Type	Tissue Temp During Calibration (°C)	Measured Frequency (MHz)	Measured Conductivity, $\sigma$ (S/m)	Measured Dielectric Constant, $\epsilon$	TARGET Conductivity, $\sigma$ (S/m)	TARGET Dielectric Constant, $\epsilon$	% dev $\sigma$	% dev $\epsilon$
08/19/2024	2450 Head	23.8	2300	1.692	39.381	1.670	39.500	1.32%	-0.30%
			2320	1.697	39.397	1.687	39.460	1.66%	-0.41%
			2400	1.804	38.983	1.752	39.289	2.73%	-0.78%
			2450	1.864	38.812	1.800	39.209	3.56%	-0.99%
			2480	1.897	38.686	1.833	39.162	3.49%	-1.22%
			2500	1.919	38.620	1.865	39.136	3.45%	-1.37%
			2550	1.980	38.416	1.909	39.073	3.72%	-1.68%
			2560	1.981	38.376	1.920	39.060	3.70%	-1.75%
			2600	2.038	38.202	1.964	39.090	3.77%	-2.07%
			2650	2.071	38.111	2.010	38.970	4.16%	-2.40%
			2660	2.126	37.874	2.051	38.967	4.16%	-2.66%
			2700	2.157	37.795	2.073	38.882	4.05%	-2.80%
			5150	4.363	34.616	4.604	36.043	-4.80%	-3.96%
			5160	4.393	34.591	4.614	36.031	-4.79%	-4.00%
			5170	4.409	34.566	4.624	36.020	-4.74%	-4.04%
			5180	4.425	34.540	4.635	36.009	-4.70%	-4.07%
			5190	4.429	34.520	4.645	36.988	-4.65%	-4.03%
			5200	4.441	34.522	4.655	36.988	-4.60%	-4.07%
			5210	4.462	34.512	4.666	36.975	-4.59%	-4.07%
			5220	4.462	34.502	4.676	36.963	-4.58%	-4.06%
			5240	4.476	34.472	4.696	36.940	-4.68%	-4.08%
			5250	4.481	34.454	4.707	36.929	-4.63%	-4.13%
			5260	4.493	34.435	4.717	36.917	-4.59%	-4.13%
			5270	4.502	34.416	4.727	36.908	-4.56%	-4.15%
			5280	4.512	34.397	4.737	36.894	-4.52%	-4.17%
			5290	4.523	34.378	4.748	36.883	-4.47%	-4.19%
			5300	4.541	34.361	4.758	36.870	-4.42%	-4.21%
			5310	4.542	34.350	4.768	36.860	-4.41%	-4.21%
			5320	4.560	34.340	4.778	36.849	-4.56%	-4.21%
			5500	4.742	34.051	4.963	35.643	-4.45%	-4.73%
			5510	4.754	34.040	4.973	35.632	-4.40%	-4.73%
			5520	4.766	34.028	4.983	35.620	-4.35%	-4.73%
			5530	4.771	34.014	4.994	35.609	-4.30%	-4.80%
			5540	4.771	34.000	5.004	35.597	-4.25%	-4.89%
			5550	4.802	33.982	5.014	35.586	-4.23%	-4.51%
			5560	4.813	33.961	5.024	35.574	-4.20%	-4.53%
			5580	4.838	33.956	5.045	35.551	-4.16%	-4.57%
			5600	4.860	33.938	5.065	35.529	-4.05%	-4.66%
			5610	4.879	33.928	5.076	35.519	-4.01%	-4.75%
			5620	4.879	33.898	5.096	35.506	-4.07%	-4.56%
			5640	4.899	33.895	5.106	35.483	-4.05%	-4.59%
			5660	4.920	33.823	5.127	35.460	-4.04%	-4.61%
			5670	4.931	33.804	5.137	35.449	-4.01%	-4.64%
			5680	4.941	33.784	5.147	35.437	-4.00%	-4.66%
			5690	4.951	33.764	5.158	35.425	-3.99%	-4.69%
			5700	4.963	33.746	5.168	35.414	-3.99%	-4.71%
			5710	4.974	33.739	5.178	35.403	-3.94%	-4.70%
			5720	4.983	33.733	5.188	35.391	-3.95%	-4.68%
			5745	6.002	33.714	5.214	35.363	-4.07%	-4.60%
			5750	6.010	33.698	5.219	35.351	-4.07%	-4.67%
			5765	6.019	33.695	5.224	35.351	-4.07%	-4.65%
			5765	6.019	33.671	5.234	35.340	-4.11%	-4.72%
			5775	6.031	33.648	5.245	35.329	-4.08%	-4.76%
			5785	6.044	33.636	5.255	35.317	-4.02%	-4.79%
			5795	6.056	33.605	5.265	35.303	-3.97%	-4.82%
			5800	6.067	33.597	5.270	35.290	-3.94%	-4.84%
			5805	6.087	33.590	5.275	35.294	-3.94%	-4.83%
			5825	6.098	33.566	5.296	35.271	-3.93%	-4.83%
			5835	6.098	33.559	5.305	35.239	-3.90%	-4.74%
			5845	6.107	33.551	5.315	35.210	-3.91%	-4.71%
			5850	6.111	33.548	5.320	35.199	-3.89%	-4.69%
			5860	6.114	33.542	5.325	35.197	-3.88%	-4.70%
			5865	6.120	33.524	5.336	35.190	-4.05%	-4.73%
			5875	6.127	33.504	5.347	35.183	-4.11%	-4.77%
			5885	6.136	33.480	5.357	35.177	-4.13%	-4.81%
			5905	6.150	33.431	5.379	35.163	-4.09%	-4.83%
			5910	6.171	33.414	5.394	35.157	-4.07%	-4.79%
			5910	6.171	33.406	5.448	35.120	-3.95%	2.03%
			5985	6.290	35.818	5.464	35.110	-3.18%	2.03%
			6000	6.306	35.798	5.480	35.100	-3.18%	1.86%
			6025	6.331	35.751	5.510	35.070	-3.25%	1.84%
			6065	6.376	35.693	5.557	35.022	-3.22%	1.60%
			6075	6.377	35.677	5.560	35.010	-3.21%	1.67%
			6095	6.404	35.606	5.580	34.988	-3.15%	1.86%
			6275	6.651	35.294	5.805	34.770	-2.65%	1.51%
			6285	6.654	35.270	5.816	34.759	-2.61%	1.47%
			6305	6.681	35.224	5.840	34.734	-2.52%	1.41%
			6345	6.733	35.168	5.887	34.696	-2.62%	1.39%
			6475	6.881	34.961	6.052	34.518	-2.66%	1.26%
			6500	6.908	34.932	6.070	34.500	-2.67%	1.25%
			6505	6.913	34.917	6.076	34.494	-2.68%	1.23%
			6545	6.967	34.856	6.122	34.446	-2.53%	1.19%
			6675	6.122	34.446	6.273	34.346	-2.35%	1.04%
			6685	6.141	34.417	6.285	34.378	-2.35%	0.99%
			6715	6.180	34.532	6.319	34.242	-2.20%	0.86%
			6785	6.257	34.399	6.400	34.158	-2.23%	0.71%
			6825	6.315	34.350	6.447	34.110	-2.05%	0.70%
			6895	6.491	34.093	6.633	33.918	-2.14%	0.62%
			6905	6.507	34.049	6.644	33.904	-2.12%	0.64%
			7005	6.510	34.054	6.650	33.900	-2.11%	0.64%
			7005	6.518	34.044	6.656	33.894	-2.07%	0.64%

The above measured tissue parameters were used in the cDASY6 software. The cDASY6 software was used to perform interpolation to determine the dielectric parameters at the SAR test device frequencies (per KDB Publication 865664 D01v01r04 and IEEE 1528-2013 6.6.1.2). The tissue parameters listed in the SAR test plots may slightly differ from the table above due to significant digit rounding in the software.

Per April 2019 TCG Workshop Notes, single head-tissue simulating liquid specified in IEC 62209-1 is permitted to use for all SAR tests.

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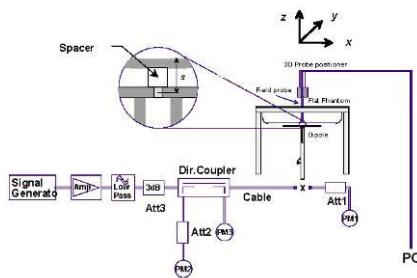
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## 8.2 Test System Verification

Prior to SAR assessment, the system is verified to  $\pm 10\%$  of the SAR measurement on the reference dipole at the time of calibration by the calibration facility. Full system validation status and result summary can be found in the SAR System Validation Appendix.

**Table 8-2**  
**System Verification Results – 1g**

SAR System	Tissue Frequency (MHz)	Tissue Type	Date	Amb. Temp. (C)	Liquid Temp. (C)	Input Power (W)	Source SN	Probe SN	DAE	System Verification TARGET & MEASURED				Measured 4cm <sup>2</sup> APD (W/m <sup>2</sup> )	1W Target 4cm <sup>2</sup> APD (W/m <sup>2</sup> )	1W Normalized 4cm <sup>2</sup> APD (W/m <sup>2</sup> )	Deviation 4cm <sup>2</sup> APD (%)
										Measured SAR 1g (W/kg)	1W Target SAR 1g (W/kg)	1W Normalized SAR 1g (W/kg)	Deviation 1g (%)				
AM6	2450	HEAD	08/19/2024	20.1	24.0	0.10	750	7499	1644	5.060	52.600	50.600	-3.80%				
AM8	5250	HEAD	07/23/2024	23.2	21.0	0.05	1163	7427	467	3.910	79.600	78.200	-1.76%				
AM8	5600	HEAD	07/23/2024	23.2	21.0	0.05	1163	7427	467	4.180	82.800	83.600	0.97%				
AM8	5750	HEAD	07/23/2024	23.2	21.0	0.05	1163	7427	467	3.820	81.100	76.400	-5.80%				
AM8	5850	HEAD	07/23/2024	23.2	21.0	0.05	1163	7427	467	4.030	79.000	80.600	2.03%				
AM2	6500	HEAD	08/14/2024	21.2	20.3	0.025	1019	7420	1333	7.320	293.000	292.800	-0.07%	32.8	1320	1312	-0.61%



**Figure 8-1**  
**System Verification Setup Diagram**



**Figure 8-2**  
**System Verification Setup Photo**

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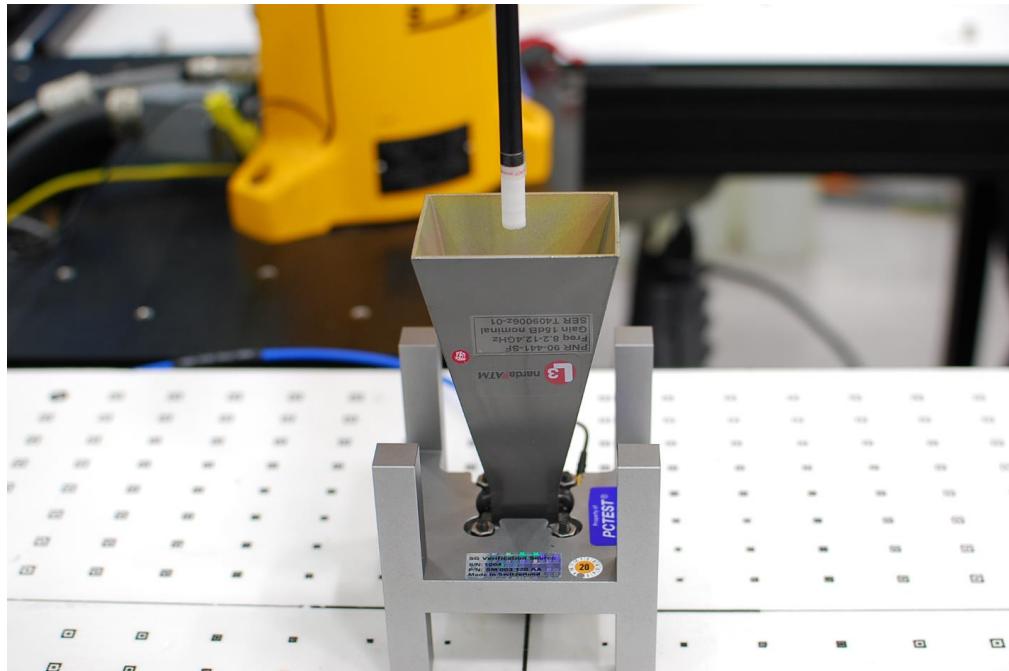
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### 8.3 Power Density Test System Verification

The system was verified to be within  $\pm 0.66$  dB of the power density targets on the calibration certificate according to the test system specification in the user's manual and calibration facility recommendation. The 0.66 dB deviation threshold represents the expanded uncertainty for system performance checks using SPEAG's mmWave verification sources. The same spatial resolution and measurement region used in the source calibration was applied during the system check.

The measured power density distribution of verification source was also confirmed through visual inspection to have no noticeable differences, both spatially (shape) and numerically (level) from the distribution provided by the manufacturer, per November 2017 TCBC Workshop Notes.



**Figure 8-3**  
**System Verification Setup Photo**

**Table 8-3**  
**10 GHz Verification Results**

System Verification											
System	Frequency (GHz)	Date	Source S/N	Probe S/N	Prad (mW)	Normal psPD (W/m <sup>2</sup> over 4 cm <sup>2</sup> )		Deviation (dB)	Total psPD (W/m <sup>2</sup> over 4 cm <sup>2</sup> )		Deviation (dB)
						Measured	Target		Measured	Target	
AM5	10	08/15/2024	1006	9487	93.3	58.10	58.50	-0.03	58.30	58.90	-0.04

Note: A **10 mm distance spacing** was used from the reference horn antenna aperture to the probe element.

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## 9 SAR DATA SUMMARY

### 9.1 2.4 GHz Bluetooth SISO Standalone Head SAR

Table 9-1

Exposure	Band / Mode	Earbud	Serial Number	Duty Cycle [%]	Power Drift [dB]	Frequency [MHz]	Channel #	Data Rate [Mbps]	Max Allowed Power [dBm]	Conducted Power [dBm]	Test Position	Spacing [mm]	Measured 1g SAR [W/kg]	Power Scaling Factor	Duty Cycle Scaling Factor	Reported 1g SAR [W/kg]	Plot #
Head	2.4 GHz Bluetooth	Left	HSRH72001QW0000831	86.78	-0.10	2402	0	1	10.50	9.83	Front	0	0.085	1.167	1.152	0.114	
Head	2.4 GHz Bluetooth	Left	HSRH72001QW0000831	86.78	0.01	2441	39	1	10.50	9.80	Front	0	0.109	1.175	1.152	0.148	A1
Head	2.4 GHz Bluetooth	Left	HSRH72001QW0000831	86.78	0.08	2480	78	1	10.50	9.99	Front	0	0.098	1.125	1.152	0.127	
ANSI/IEEE C95.1-1992 - SAFETY LIMIT Spatial Peak Uncontrolled Exposure/General Population																	

Note: The reported SAR was scaled to 100% transmission duty factor.

### 9.2 5 GHz NB U-NII 1 Standalone Head SAR

Table 9-2

Exposure	Band / Mode	Earbud	Serial Number	Duty Cycle [%]	Power Drift [dB]	Frequency [MHz]	Channel #	Data Rate [Mbps]	Max Allowed Power [dBm]	Conducted Power [dBm]	Test Position	Spacing [mm]	Measured 1g SAR [W/kg]	Power Scaling Factor	Duty Cycle Scaling Factor	Reported 1g SAR [W/kg]	Plot #
Head	NB U-NII 1	Left	HSRH72001QW0000831	90.33	0.09	5245	High	4	6.00	4.85	Front	0	0.035	1.303	1.107	0.050	
Head	NB U-NII 1	Left	HSRH72001QW0000831	90.33	0.02	5157	Low	4	6.00	5.29	Front	0	0.038	1.178	1.107	0.050	
Head	NB U-NII 1	Left	HSRH72001QW0000831	90.33	0.02	5201	Mid	4	6.00	5.14	Front	0	0.035	1.219	1.107	0.047	
ANSI/IEEE C95.1-1992 - SAFETY LIMIT Spatial Peak Uncontrolled Exposure/General Population																	

Note: The reported SAR was scaled to 100% transmission duty factor.

### 9.3 5 GHz NB U-NII 3 Standalone Head SAR

Table 9-3

Exposure	Band / Mode	Earbud	Serial Number	Duty Cycle [%]	Power Drift [dB]	Frequency [MHz]	Channel #	Data Rate [Mbps]	Max Allowed Power [dBm]	Conducted Power [dBm]	Test Position	Spacing [mm]	Measured 1g SAR [W/kg]	Power Scaling Factor	Duty Cycle Scaling Factor	Reported 1g SAR [W/kg]	Plot #
Head	NB U-NII 3	Left	HSRH72001QW0000831	90.33	0.01	5844	High	4	6.50	4.85	Front	0	0.069	1.462	1.107	0.112	A2
Head	NB U-NII 3	Left	HSRH72001QW0000831	90.33	0.03	5731	Low	4	6.50	5.15	Front	0	0.044	1.365	1.107	0.066	
Head	NB U-NII 3	Left	HSRH72001QW0000831	90.33	0.00	5788	Mid	4	6.50	5.08	Front	0	0.062	1.387	1.107	0.095	
ANSI/IEEE C95.1-1992 - SAFETY LIMIT Spatial Peak Uncontrolled Exposure/General Population																	

Note: The reported SAR was scaled to 100% transmission duty factor.

### 9.4 6 GHz NB U-NII 5 Standalone Head SAR

Table 9-4

Exposure	Band / Mode	Earbud	Serial Number	Duty Cycle [%]	Power Drift [dB]	Frequency [MHz]	Channel #	Data Rate [Mbps]	Max Allowed Power [dBm]	Conducted Power [dBm]	Test Position	Spacing [mm]	Measured 1g SAR [W/kg]	Power Scaling Factor	Duty Cycle Scaling Factor	Reported 1g SAR [W/kg]	Plot #
Head	NB U-NII 5	Left	HSRH72001QW0000831	92.00	-0.21	6420	High	8	2.00	1.78	Front	0	0.038	1.052	1.087	0.043	A3
Head	NB U-NII 5	Left	HSRH72001QW0000831	92.00	0.05	6108	Low	8	2.00	1.38	Front	0	0.031	1.153	1.087	0.039	
Head	NB U-NII 5	Left	HSRH72001QW0000831	92.00	-0.10	6186	Low-Mid	8	2.00	1.49	Front	0	0.032	1.125	1.087	0.039	
Head	NB U-NII 5	Left	HSRH72001QW0000831	92.00	0.07	6264	Mid	8	2.00	1.45	Front	0	0.030	1.135	1.087	0.037	
Head	NB U-NII 5	Left	HSRH72001QW0000831	92.00	0.01	6342	Mid-High	8	2.00	1.50	Front	0	0.033	1.122	1.087	0.040	
ANSI/IEEE C95.1-1992 - SAFETY LIMIT Spatial Peak Uncontrolled Exposure/General Population																	

Note: The reported SAR was scaled to 100% transmission duty factor.

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## 9.5 2.4 GHz Bluetooth SISO Standalone Body-Worn SAR

Table 9-5

Exposure	Band / Mode	Earbud	Serial Number	Duty Cycle [%]	Power Drift [dB]	Frequency [MHz]	Channel #	Data Rate [Mbps]	Max Allowed Power [dBm]	Conducted Power [dBm]	Test Position	Spacing [mm]	Measured 1g SAR [W/kg]	Power Scaling Factor	Duty Cycle Scaling Factor	Reported 1g SAR [W/kg]	Plot #
Body-worn	2.4 GHz Bluetooth	Left	HSRH72001QW0000831	86.78	<b>0.01</b>	2480	78	1	10.50	<b>9.99</b>	Back	0	<b>0.378</b>	1.125	1.152	0.490	
Body-worn	2.4 GHz Bluetooth	Left	HSRH72001QW0000831	86.78	<b>-0.03</b>	2402	0	1	10.50	<b>9.83</b>	Button	0	<b>0.551</b>	1.167	1.152	<b>0.741</b>	A4
Body-worn	2.4 GHz Bluetooth	Left	HSRH72001QW0000831	86.78	<b>-0.02</b>	2441	39	1	10.50	<b>9.80</b>	Button	0	<b>0.546</b>	1.175	1.152	0.739	
Body-worn	2.4 GHz Bluetooth	Left	HSRH72001QW0000831	86.78	<b>0.08</b>	2480	78	1	10.50	<b>9.99</b>	Antenna Touching	0	<b>0.451</b>	1.125	1.152	0.585	
Body-worn	2.4 GHz Bluetooth	Left	HSRH72001QW0000831	86.78	<b>-0.05</b>	2480	78	1	10.50	<b>9.99</b>	Button	0	<b>0.521</b>	1.125	1.152	0.675	
ANSI/IEEE C95.1 1992 - SAFETY LIMIT Spatial Peak Uncontrolled Exposure/General Population												Body 1.6 W/kg (mW/g) averaged over 1 gram					

Note: The reported SAR was scaled to 100% transmission duty factor.

## 9.6 5 GHz NB U-NII 1 Standalone Body-Worn SAR

Table 9-6

Exposure	Band / Mode	Earbud	Serial Number	Duty Cycle [%]	Power Drift [dB]	Frequency [MHz]	Channel #	Data Rate [Mbps]	Max Allowed Power [dBm]	Conducted Power [dBm]	Test Position	Spacing [mm]	Measured 1g SAR [W/kg]	Power Scaling Factor	Duty Cycle Scaling Factor	Reported 1g SAR [W/kg]	Plot #
Body-worn	NB U-NII 1	Left	HSRH72001QW0000831	90.33	<b>-0.04</b>	5245	High	4	6.00	<b>4.85</b>	Back	0	<b>0.715</b>	1.303	1.107	1.031	
Body-worn	NB U-NII 1	Left	HSRH72001QW0000831	90.33	<b>0.01</b>	5157	Low	4	6.00	<b>5.29</b>	Back	0	<b>0.667</b>	1.178	1.107	0.870	
Body-worn	NB U-NII 1	Left	HSRH72001QW0000831	90.33	<b>-0.02</b>	5201	Mid	4	6.00	<b>5.14</b>	Back	0	<b>0.717</b>	1.219	1.107	0.968	
Body-worn	NB U-NII 1	Left	HSRH72001QW0000831	90.33	<b>-0.06</b>	5157	Low	4	6.00	<b>5.29</b>	Button	0	<b>0.519</b>	1.178	1.107	0.677	
Body-worn	NB U-NII 1	Left	HSRH72001QW0000831	90.33	<b>0.02</b>	5157	Low	4	6.00	<b>5.29</b>	Antenna Touching	0	<b>0.520</b>	1.178	1.107	0.678	
ANSI/IEEE C95.1 1992 - SAFETY LIMIT Spatial Peak Uncontrolled Exposure/General Population												Body 1.6 W/kg (mW/g) averaged over 1 gram					

Note: The reported SAR was scaled to 100% transmission duty factor.

## 9.7 5 GHz NB U-NII 3 Standalone Body-Worn SAR

Table 9-7

Exposure	Band / Mode	Earbud	Serial Number	Duty Cycle [%]	Power Drift [dB]	Frequency [MHz]	Channel #	Data Rate [Mbps]	Max Allowed Power [dBm]	Conducted Power [dBm]	Test Position	Spacing [mm]	Measured 1g SAR [W/kg]	Power Scaling Factor	Duty Cycle Scaling Factor	Reported 1g SAR [W/kg]	Plot #
Body-worn	NB U-NII 3	Left	HSRH72001QW0000831	90.33	<b>-0.16</b>	5844	High	4	6.50	<b>4.85</b>	Back	0	<b>0.636</b>	1.462	1.107	1.029	
Body-worn	NB U-NII 3	Left	HSRH72001QW0000831	90.33	<b>0.01</b>	5731	Low	4	6.50	<b>5.15</b>	Back	0	<b>0.599</b>	1.365	1.107	0.905	
Body-worn	NB U-NII 3	Left	HSRH72001QW0000831	90.33	<b>-0.17</b>	5788	Mid	4	6.50	<b>5.08</b>	Back	0	<b>0.770</b>	1.387	1.107	<b>1.182</b>	A5
Body-worn	NB U-NII 3	Left	HSRH72001QW0000831	90.33	<b>0.17</b>	5731	Low	4	6.50	<b>5.15</b>	Button	0	<b>0.277</b>	1.365	1.107	0.419	
Body-worn	NB U-NII 3	Left	HSRH72001QW0000831	90.33	<b>-0.20</b>	5731	Low	4	6.50	<b>5.15</b>	Antenna Touching	0	<b>0.434</b>	1.365	1.107	0.656	
ANSI/IEEE C95.1 1992 - SAFETY LIMIT Spatial Peak Uncontrolled Exposure/General Population												Body 1.6 W/kg (mW/g) averaged over 1 gram					

Note: The reported SAR was scaled to 100% transmission duty factor.

## 9.8 6 GHz NB U-NII 5 Standalone Body-Worn SAR

Table 9-8

Exposure	Band / Mode	Earbud	Serial Number	Duty Cycle [%]	Power Drift [dB]	Frequency [MHz]	Channel #	Data Rate [Mbps]	Max Allowed Power [dBm]	Conducted Power [dBm]	Test Position	Spacing [mm]	Measured 1g SAR [W/kg]	Power Scaling Factor	Duty Cycle Scaling Factor	Reported 1g SAR [W/kg]	Plot #
Body-worn	NB U-NII 5	Left	HSRH72001QW0000831	92.00	<b>-0.09</b>	6420	High	8	2.00	<b>1.78</b>	Back	0	<b>0.318</b>	1.052	1.087	0.364	A6
Body-worn	NB U-NII 5	Left	HSRH72001QW0000831	92.00	<b>-0.07</b>	6108	Low	8	2.00	<b>1.38</b>	Back	0	<b>0.312</b>	1.153	1.087	<b>0.391</b>	
Body-worn	NB U-NII 5	Left	HSRH72001QW0000831	92.00	<b>-0.17</b>	6186	Low-Mid	8	2.00	<b>1.49</b>	Back	0	<b>0.279</b>	1.125	1.087	0.341	
Body-worn	NB U-NII 5	Left	HSRH72001QW0000831	92.00	<b>0.02</b>	6264	Mid	8	2.00	<b>1.45</b>	Back	0	<b>0.243</b>	1.135	1.087	0.300	
Body-worn	NB U-NII 5	Left	HSRH72001QW0000831	92.00	<b>-0.21</b>	6342	Mid-High	8	2.00	<b>1.50</b>	Back	0	<b>0.276</b>	1.122	1.087	0.337	
Body-worn	NB U-NII 5	Left	HSRH72001QW0000831	92.00	<b>-0.06</b>	6420	High	8	2.00	<b>1.78</b>	Antenna Touching	0	<b>0.193</b>	1.052	1.087	0.221	
Body-worn	NB U-NII 5	Left	HSRH72001QW0000831	92.00	<b>-0.15</b>	6420	High	8	2.00	<b>1.78</b>	Button	0	<b>0.122</b>	1.052	1.087	0.140	
ANSI/IEEE C95.1 1992 - SAFETY LIMIT Spatial Peak Uncontrolled Exposure/General Population												Body 1.6 W/kg (mW/g) averaged over 1 gram					
Exposure	Band / Mode	Earbud	Serial Number	Duty Cycle [%]	Power Drift [dB]	Frequency [MHz]	Channel #	Data Rate [Mbps]	Max Allowed Power [dBm]	Conducted Power [dBm]	Test Position	Spacing [mm]	Measured APD [W/m <sup>2</sup> (4cm <sup>2</sup> )]	Power Scaling Factor	Duty Cycle Scaling Factor	Reported APD [W/m <sup>2</sup> (4cm <sup>2</sup> )]	
Body-worn	NB U-NII 5	Left	HSRH72001QW0000831	92.00	<b>-0.09</b>	6420	High	8	2.00	<b>1.78</b>	Back	0	<b>1.010</b>	1.052	1.087	1.155	
Body-worn	NB U-NII 5	Left	HSRH72001QW0000831	92.00	<b>-0.07</b>	6108	Low	8	2.00	<b>1.38</b>	Back	0	<b>1.020</b>	1.153	1.087	1.299	
Body-worn	NB U-NII 5	Left	HSRH72001QW0000831	92.00	<b>-0.17</b>	6186	Low-Mid	8	2.00	<b>1.49</b>	Back	0	<b>0.905</b>	1.125	1.087	1.107	
Body-worn	NB U-NII 5	Left	HSRH72001QW0000831	92.00	<b>0.02</b>	6264	Mid	8	2.00	<b>1.45</b>	Back	0	<b>0.783</b>	1.135	1.087	0.966	
Body-worn	NB U-NII 5	Left	HSRH72001QW0000831	92.00	<b>-0.21</b>	6342	Mid-High	8	2.00	<b>1.50</b>	Back	0	<b>0.874</b>	1.122	1.087	1.026	
Body-worn	NB U-NII 5	Left	HSRH72001QW0000831	92.00	<b>-0.06</b>	6420	High	8	2.00	<b>1.78</b>	Antenna Touching	0	<b>0.755</b>	1.052	1.087	0.863	
Body-worn	NB U-NII 5	Left	HSRH72001QW0000831	92.00	<b>-0.15</b>	6420	High	8	2.00	<b>1.78</b>	Button	0	<b>0.457</b>	1.052	1.087	0.523	

Note: The reported SAR was scaled to 100% transmission duty factor.

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## 9.9 SAR Test Notes

### General Notes:

1. Batteries are fully charged at the beginning of the SAR measurements.
2. Liquid tissue depth was at least 15.0 cm for all frequencies.
3. The manufacturer has confirmed that the device(s) tested have the same physical, mechanical, and thermal characteristics and are within operational tolerances expected for production units.
4. SAR results were scaled to the maximum allowed power to demonstrate compliance per FCC KDB Publication 447498 D04v01.
5. To demonstrate compliance for Head, SAR testing was performed on a flat phantom filled with head tissue equivalent medium.
6. Per manufacturer request, Body-Worn SAR was additionally evaluated as a conservative SAR test condition for the left earbud (BCG-A3056).
7. Per FCC KDB Publication 865664 D01v01r04, variability SAR tests were not required since measured SAR results for all frequency bands were less than 0.8 W/kg and 2.0 W/kg for 10g SAR. The orange highlights throughout the report represents the highest scaled SAR per Equipment Class.

### Bluetooth/NB UNII Notes

1. Bluetooth/NB UNII SAR was evaluated with a test mode with hopping disabled with DH5 operation. The reported SAR was scaled to the 100% transmission duty factor to determine compliance for a more conservative exposure analysis. See section 7.2 for the time domain plot and calculation for the duty factor of the device.

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## 9.10 Power Density Data

MEASUREMENT RESULTS																					
Frequency (MHz)	Channel	Mode	Maximum Allowed Power (dBm)	Conducted Power (dBm)	Power Drift (dB)	Spacing (mm)	Ant.	DUT Serial Number	Data Rate (Mbps)	Side	Duty Cycle (%)	Grid Step (λ)	iPD (W/m²)	Scaling Factor for Measurement Uncertainty per IEC 62479	Scaling Factor (Power)	Scaling Factor (Duty Cycle)	Normal psPD (W/m²)	Scaled Normal psPD (W/m²)	Total psPD (W/m²)	Scaled Total psPD (W/m²)	Plot #
6420	High	NB U-NII5	2.00	1.78	-0.08	2	Left	H5RH72001QW0000B31	8	Front	92.00	0.25	1.790	1.554	1.052	1.087	0.189	0.336	0.196	0.348	
6420	High	NB U-NII5	2.00	1.78	-0.16	2	Left	H5RH72001QW0000B31	8	Back	92.00	0.25	1.750	1.554	1.052	1.087	0.409	0.727	0.458	0.814	
6420	High	NB U-NII5	2.00	1.78	-0.01	2	Left	H5RH72001QW0000B31	8	Antenna Touching	92.00	0.25	2.840	1.554	1.052	1.087	0.768	1.365	0.792	1.407	
6420	High	NB U-NII5	2.00	1.78	-0.19	2	Left	H5RH72001QW0000B31	8	Button	92.00	0.25	2.520	1.554	1.052	1.087	0.777	1.381	0.813	1.445	
6108	Low	NB U-NII5	2.00	1.38	-0.03	2	Left	H5RH72001QW0000B31	8	Button	92.00	0.25	0.771	1.554	1.153	1.087	0.283	0.551	0.309	0.602	
6186	Low-Mid	NB U-NII5	2.00	1.49	-0.02	2	Left	H5RH72001QW0000B31	8	Button	92.00	0.25	2.020	1.554	1.125	1.087	0.393	0.747	0.407	0.773	
6264	Mid	NB U-NII5	2.00	1.45	-0.05	2	Left	H5RH72001QW0000B31	8	Button	92.00	0.25	0.795	1.554	1.135	1.087	0.237	0.454	0.245	0.470	
6342	Mid-High	NB U-NII5	2.00	1.50	-0.01	2	Left	H5RH72001QW0000B31	8	Button	92.00	0.25	1.220	1.554	1.122	1.087	0.288	0.546	0.305	0.578	
6420	High	NB U-NII5	2.00	1.78	-0.03	9.34	Left	H5RH72001QW0000B31	8	Button	92.00	0.25	1.720	1.554	1.052	1.087	0.286	0.508	0.289	0.514	

## 9.11 Power Density Notes

1. The manufacturer has confirmed that the devices tested have the same physical, mechanical, and thermal characteristics and are within operational tolerances expected for production units.
2. Batteries are fully charged at the beginning of the measurements. The DUT was connected to a wall charger for some measurements due to the test duration. It was confirmed that the charger plugged into this DUT did not impact the near-field PD test results.
3. Power density was calculated by repeated E-field measurements on two measurement planes separated by  $\lambda/4$ .
4. The device was 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.
5. Per FCC guidance and equipment manufacturer guidance, power density results were scaled according to IEC 62479:2010 for the portion of the measurement uncertainty  $> 30\%$ . Total expanded uncertainty of 2.68 dB (85.4%) was used to determine the psPD measurement scaling factor.
6. Per equipment manufacturer guidance, power density was measured at  $d=2\text{mm}$  and  $d=\lambda/5\text{mm}$  using the same grid size and grid step size for some frequencies and surfaces. The integrated Power Density (iPD) was calculated based on these measurements. Since iPD ratio between the two distances is  $\geq -1\text{dB}$ , the grid step was sufficient for determining compliance at  $d=2\text{mm}$ .
7. PD results were scaled to the maximum allowed power to demonstrate compliance per FCC KDB Publication 447498 D04v01.
8. PTP-PR algorithm was used during psPD measurement and calculations.

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## 10 SAR MEASUREMENT VARIABILITY

### 10.1 Measurement Variability

Per FCC KDB Publication 865664 D01v01, SAR measurement variability was not assessed for each frequency band since all measured SAR values are < 0.8 W/kg for 1g SAR and < 2.0 W/kg for 10g SAR.

### 10.2 Measurement Uncertainty

The measured SAR was <1.5 W/kg for 1g and <3.75 W/kg for 10g for all frequency bands. Therefore, per KDB Publication 865664 D01v01r04, the extended measurement uncertainty analysis per IEEE 1528-2013 was not required.

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Manufacturer	Model	Description	Cal Date	Cal Interval	Cal Due	Serial Number
Agilent	E4404B	Spectrum Analyzer	N/A	N/A	N/A	MY45113242
Agilent	E4438C	ESG Vector Signal Generator	11/14/2023	Annual	11/14/2024	MY45093852
Agilent	E4438C	ESG Vector Signal Generator	11/15/2023	Annual	11/15/2024	MY45092078
Agilent	N5182A	MXG Vector Signal Generator	10/12/2023	Annual	10/12/2024	MY47400015
Agilent	N5182A	MXG Vector Signal Generator	3/7/2024	Annual	3/7/2025	MY47420603
Agilent	8753ES	S-Parameter Vector Network Analyzer	1/10/2024	Annual	1/10/2025	MY40001472
Agilent	E5515C	Wireless Communications Test Set	CBT	N/A	CBT	GB46310798
Agilent	E5515C	Wireless Communications Test Set	CBT	N/A	CBT	US41140256
Agilent	N4010A	Wireless Connectivity Test Set	N/A	N/A	N/A	GB46170464
Amplifier Research	15S1G6	Amplifier	CBT	N/A	CBT	433973
Amplifier Research	15S1G6	Amplifier	CBT	N/A	CBT	433974
Amplifier Research	150A100C	Amplifier	CBT	N/A	CBT	350132
Anritsu	MN8110B	I/O Adaptor	CBT	N/A	CBT	6261747881
Anritsu	ML2496A	Power Meter	6/24/2024	Annual	6/24/2025	1840005
Anritsu	ML2495A	Power Meter	7/8/2024	Annual	7/8/2025	1039008
Anritsu	MA2411B	Pulse Power Sensor	8/22/2023	Annual	8/22/2024	1726262
Anritsu	MA2411B	Pulse Power Sensor	11/8/2023	Annual	11/8/2024	1027293
Anritsu	MA24106A	USB Power Sensor	12/4/2023	Annual	12/4/2024	1520501
Anritsu	MA24106A	USB Power Sensor	4/15/2024	Annual	4/15/2025	1827528
Mini-Circuits	PWR-4GHS	USB Power Sensor	6/12/2024	Annual	6/12/2025	12001070013
Control Company	4052	Long Stem Thermometer	2/27/2024	Biennial	2/27/2026	240174346
Control Company	4052	Long Stem Thermometer	2/27/2024	Biennial	2/27/2026	240171096
Control Company	4052	Long Stem Thermometer	2/27/2024	Biennial	2/27/2026	240171059
Control Company	4040	Therm./ Clock/ Humidity Monitor	4/15/2024	Biennial	4/15/2026	240310280
Control Company	4040	Therm./ Clock/ Humidity Monitor	4/15/2024	Biennial	4/15/2026	240310282
Control Company	S66279	Therm./ Clock/ Humidity Monitor	2/16/2024	Biennial	2/16/2026	240140051
Mitutoyo	500-196-30	CD-6"ASX 6inch Digital Caliper	2/16/2022	Triennial	2/16/2025	A20238413
Keysight Technologies	N9020A	MXA Signal Analyzer	4/11/2024	Annual	4/11/2025	MY54500644
Agilent	N9020A	MXA Signal Analyzer	6/14/2024	Annual	6/14/2025	MY56470202
MCL	BW-NGW5+	6dB Attenuator	CBT	N/A	CBT	1139
Mini-Circuits	VLF-6000+	Low Pass Filter DC to 6000 MHz	CBT	N/A	CBT	N/A
Mini-Circuits	BW-N20W5+	DC to 18 GHz Precision Fixed 20 dB Attenuator	CBT	N/A	CBT	N/A
Mini-Circuits	NLP-1200+	Low Pass Filter DC to 1000 MHz	CBT	N/A	CBT	N/A
Mini-Circuits	NLP-2950+	Low Pass Filter DC to 2700 MHz	CBT	N/A	CBT	N/A
Mini-Circuits	BW-N20W5	Power Attenuator	CBT	N/A	CBT	1226
Mini-Circuits	ZUDC10-83-S+	Directional Coupler	CBT	N/A	CBT	2050
Narda	4772-3	Attenuator (3dB)	CBT	N/A	CBT	9406
Narda	BW-S3W2	Attenuator (3dB)	CBT	N/A	CBT	120
Seekonk	NC-100	Torque Wrench	CBT	N/A	CBT	22217
Seekonk	NC-100	Torque Wrench	4/2/2024	Biennial	4/2/2026	1262
SPEAG	DAK-3.5	Dielectric Assessment Kit	11/13/2023	Annual	11/13/2024	1277
SPEAG	DAKS-3.5	Portable Dielectric Assessment Kit	8/14/2023	Annual	8/14/2024	1041
SPEAG	MAIA	Modulation and Audio Interference Analyzer	N/A	N/A	N/A	1237
SPEAG	MAIA	Modulation and Audio Interference Analyzer	N/A	N/A	N/A	1331
SPEAG	MAIA	Modulation and Audio Interference Analyzer	N/A	N/A	N/A	1390
SPEAG	5G Verification Source 10GHz	10GHz System Verification Antenna	10/13/2023	Annual	10/13/2024	1006
SPEAG	D2450V2	2450 MHz SAR Dipole	5/11/2022	Triennial	5/11/2025	750
SPEAG	D5GHzV2	5 GHz SAR Dipole	6/12/2024	Annual	6/12/2025	1163
SPEAG	D6.5GHzV2	6.5 GHz SAR Dipole	10/11/2023	Annual	10/11/2024	1019
SPEAG	DAE4	Dasy Data Acquisition Electronics	12/7/2023	Annual	12/7/2024	1644
SPEAG	DAE4	Dasy Data Acquisition Electronics	2/9/2024	Annual	2/9/2025	467
SPEAG	DAE4	Dasy Data Acquisition Electronics	4/9/2024	Annual	4/9/2025	1582
SPEAG	DAE4	Dasy Data Acquisition Electronics	10/18/2023	Annual	10/18/2024	1333
SPEAG	EUmmWV4	mmWave Probe	4/8/2024	Annual	4/8/2025	9487
SPEAG	EX3DV4	SAR Probe	2/9/2024	Annual	2/9/2025	7427
SPEAG	EX3DV4	SAR Probe	1/16/2024	Annual	1/16/2025	7499
SPEAG	EX3DV4	SAR Probe	10/16/2023	Annual	10/16/2024	7420

All equipment was used solely within its respective calibration period.

Note: CBT (Calibrated Before Testing). Prior to testing, the measurement paths containing a cable, amplifier, attenuator, coupler, or filter were connected to a calibrated source (i.e., a signal generator) to determine the losses of the measurement path. The power meter offset was then adjusted to compensate for the measurement system losses. This level offset is stored within the power meter before measurements are made. This calibration verification procedure applies to the system verification and output power measurements. The calibrated reading is then taken directly from the power meter after compensation of the losses for all final power measurements.

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## 12 MEASUREMENT UNCERTAINTIES

Applicable for SAR measurements < 6 GHz:

a	b	c	d	e= f(d,k)	f	g	h = c x f/e	i = c x g/e	k
Uncertainty Component	IEEE 1528 Sec.	Tol. (± %)	Prob. Dist.	Div.	c <sub>i</sub> 1gm	c <sub>i</sub> 10 gms	1gm u <sub>i</sub> (± %)	10gms u <sub>i</sub> (± %)	v <sub>i</sub>
<b>Measurement System</b>									
Probe Calibration	E2.1	7	N	1	1	1	7.0	7.0	∞
Axial Isotropy	E2.2	0.25	N	1	0.7	0.7	0.2	0.2	∞
Hemispherical Isotropy	E2.2	1.3	N	1	0.7	0.7	0.9	0.9	∞
Boundary Effect	E2.3	2	R	1.732	1	1	1.2	1.2	∞
Linearity	E2.4	0.3	N	1	1	1	0.3	0.3	∞
System Detection Limits	E2.4	0.25	R	1.732	1	1	0.1	0.1	∞
Modulation Response	E2.5	4.8	R	1.732	1	1	2.8	2.8	∞
Readout Electronics	E2.6	0.3	N	1	1	1	0.3	0.3	∞
Response Time	E2.7	0.8	R	1.732	1	1	0.5	0.5	∞
Integration Time	E2.8	2.6	R	1.732	1	1	1.5	1.5	∞
RF Ambient Conditions - Noise	E6.1	3	R	1.732	1	1	1.7	1.7	∞
RF Ambient Conditions - Reflections	E6.1	3	R	1.732	1	1	1.7	1.7	∞
Probe Positioner Mechanical Tolerance	E6.2	0.8	R	1.732	1	1	0.5	0.5	∞
Probe Positioning w/ respect to Phantom	E6.3	6.7	R	1.732	1	1	3.9	3.9	∞
Extrapolation, Interpolation & Integration algorithms for Max. SAR Evaluation	E5	4	R	1.732	1	1	2.3	2.3	∞
<b>Test Sample Related</b>									
Test Sample Positioning	E4.2	3.12	N	1	1	1	3.1	3.1	35
Device Holder Uncertainty	E4.1	1.67	N	1	1	1	1.7	1.7	5
Output Power Variation - SAR drift measurement	E2.9	5	R	1.732	1	1	2.9	2.9	∞
SAR Scaling	E6.5	0	R	1.732	1	1	0.0	0.0	∞
<b>Phantom &amp; Tissue Parameters</b>									
Phantom Uncertainty (Shape & Thickness tolerances)	E3.1	7.6	R	1.73	1.0	1.0	4.4	4.4	∞
Liquid Conductivity - measurement uncertainty	E3.3	4.3	N	1	0.78	0.71	3.3	3.0	76
Liquid Permittivity - measurement uncertainty	E3.3	4.2	N	1	0.23	0.26	1.0	1.1	75
Liquid Conductivity - Temperature Uncertainty	E3.4	3.4	R	1.732	0.78	0.71	1.5	1.4	∞
Liquid Permittivity - Temperature Uncertainty	E3.4	0.6	R	1.732	0.23	0.26	0.1	0.1	∞
Liquid Conductivity - deviation from target values	E3.2	5.0	R	1.73	0.64	0.43	1.8	1.2	∞
Liquid Permittivity - deviation from target values	E3.2	5.0	R	1.73	0.60	0.49	1.7	1.4	∞
<b>Combined Standard Uncertainty (k=1)</b>					RSS			12.2	12.0
<b>Expanded Uncertainty (95% CONFIDENCE LEVEL)</b>					k=2			24.4	24.0

The above measurement uncertainties are according to IEEE Std. 1528-2013

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Applicable for SAR measurements > 6 GHz:

a	b	c	d	e= f(d,k)	f	g	h = c x f/e	i = c x g/e	k	
<b>Uncertainty Component</b>	IEEE 1528 Sec.	Tol. (± %)	Prob. Dist.	Div.	c <sub>i</sub> 1gm	c <sub>i</sub> 10 gms	1gm u <sub>i</sub> (± %)	10gms u <sub>i</sub> (± %)	v <sub>i</sub>	
<b>Measurement System</b>										
Probe Calibration	E2.1	9.3	N	1	1	1	9.3	9.3	∞	
Axial Isotropy	E2.2	0.25	N	1	0.7	0.7	0.2	0.2	∞	
Hemispherical Isotropy	E2.2	1.3	N	1	0.7	0.7	0.9	0.9	∞	
Boundary Effect	E2.3	2	R	1.732	1	1	1.2	1.2	∞	
Linearity	E2.4	0.3	N	1	1	1	0.3	0.3	∞	
System Detection Limits	E2.4	0.25	R	1.732	1	1	0.1	0.1	∞	
Modulation Response	E2.5	4.8	R	1.732	1	1	2.8	2.8	∞	
Readout Electronics	E2.6	0.3	N	1	1	1	0.3	0.3	∞	
Response Time	E2.7	0.8	R	1.732	1	1	0.5	0.5	∞	
Integration Time	E2.8	2.6	R	1.732	1	1	1.5	1.5	∞	
RF Ambient Conditions - Noise	E6.1	3	R	1.732	1	1	1.7	1.7	∞	
RF Ambient Conditions - Reflections	E6.1	3	R	1.732	1	1	1.7	1.7	∞	
Probe Positioner Mechanical Tolerance	E6.2	0.8	R	1.732	1	1	0.5	0.5	∞	
Probe Positioning w/ respect to Phantom	E6.3	6.7	R	1.732	1	1	3.9	3.9	∞	
Extrapolation, Interpolation & Integration algorithms for Max. SAR Evaluation	E5	4	R	1.732	1	1	2.3	2.3	∞	
<b>Test Sample Related</b>										
Test Sample Positioning	E4.2	3.12	N	1	1	1	3.1	3.1	35	
Device Holder Uncertainty	E4.1	1.67	N	1	1	1	1.7	1.7	5	
Output Power Variation - SAR drift measurement	E2.9	5	R	1.732	1	1	2.9	2.9	∞	
SAR Scaling	E6.5	0	R	1.732	1	1	0.0	0.0	∞	
<b>Phantom &amp; Tissue Parameters</b>										
Phantom Uncertainty (Shape & Thickness tolerances)	E3.1	7.6	R	1.73	1.0	1.0	4.4	4.4	∞	
Liquid Conductivity - measurement uncertainty	E3.3	4.3	N	1	0.78	0.71	3.3	3.0	76	
Liquid Permittivity - measurement uncertainty	E3.3	4.2	N	1	0.23	0.26	1.0	1.1	75	
Liquid Conductivity - Temperature Uncertainty	E3.4	3.4	R	1.732	0.78	0.71	1.5	1.4	∞	
Liquid Permittivity - Temperature Uncertainty	E3.4	0.6	R	1.732	0.23	0.26	0.1	0.1	∞	
Liquid Conductivity - deviation from target values	E3.2	5.0	R	1.73	0.64	0.43	1.8	1.2	∞	
Liquid Permittivity - deviation from target values	E3.2	5.0	R	1.73	0.60	0.49	1.7	1.4	∞	
<b>Combined Standard Uncertainty (k=1)</b>							RSS	13.8	13.6	191
<b>Expanded Uncertainty</b> (95% CONFIDENCE LEVEL)							k=2	27.6	27.1	

The above measurement uncertainties are according to IEEE Std. 1528-2013

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Applicable for Power Density measurements:

a	b	c	d	e	f = c x f/e	g
Uncertainty Component	Unc. (± dB)	Prob. Dist.	Div.	c <sub>i</sub>	u <sub>i</sub> (± dB)	v <sub>i</sub>
<b>Measurement System</b>						
Calibration	0.49	N	1	1	0.49	∞
Probe Correction	0.00	R	1.73	1	0.00	∞
Frequency Response	0.20	R	1.73	1	0.12	∞
Sensor Cross Coupling	0.00	R	1.73	1	0.00	∞
Isotropy	0.50	R	1.73	1	0.29	∞
Linearity	0.20	R	1.73	1	0.12	∞
Probe Scattering	0.00	R	1.73	1	0.00	∞
Probe Positioning offset	0.30	R	1.73	1	0.17	∞
Probe Positioning Repeatability	0.04	R	1.73	1	0.02	∞
Sensor Mechanical Offset	0.00	R	1.73	1	0.00	∞
Probe Spatial Resolution	0.00	R	1.73	1	0.00	∞
Field Impedance Dependence	0.00	R	1.73	1	0.00	∞
Amplitude and Phase Drift	0.00	R	1.73	1	0.00	∞
Amplitude and Phase Noise	0.04	R	1.73	1	0.02	∞
Measurement Area Truncation	0.00	R	1.73	1	0.00	∞
Data Acquisition	0.03	N	1	1	0.03	∞
Sampling	0.00	R	1.73	1	0.00	∞
Field Reconstruction	2.00	R	1.73	1	1.15	∞
Forward Transformation	0.00	R	1.73	1	0.00	∞
Power Density Scaling	0.00	R	1.73	1	0.00	∞
Spatial Averaging	0.10	R	1.73	1	0.06	∞
System Detection Limit	0.04	R	1.73	1	0.02	∞
<b>Test Sample Related</b>						
Probe Coupling with DUT	0.00	R	1.73	1	0.00	∞
Modulation Response	0.40	R	1.73	1	0.23	∞
Integration Time	0.00	R	1.73	1	0.00	∞
Response Time	0.00	R	1.73	1	0.00	∞
Device Holder Influence	0.10	R	1.73	1	0.06	∞
DUT alignment	0.00	R	1.73	1	0.00	∞
RF Ambient Conditions	0.04	R	1.73	1	0.02	∞
Ambient Reflections	0.04	R	1.73	1	0.02	∞
Immunity/Secondary Reception	0.00	R	1.73	1	0.00	∞
Drift of DUT	0.21	R	1.73	1	0.12	∞
<b>Combined Standard Uncertainty (k=1)</b>					RSS	1.34
<b>Expanded Uncertainty</b> (95% CONFIDENCE LEVEL)					k=2	2.68

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## 13 CONCLUSION

### 13.1 Measurement Conclusion

The SAR evaluation indicates that the EUT complies with the RF radiation exposure limits of the FCC and Innovation, Science, and Economic Development Canada, with respect to all parameters subject to this test. These measurements were taken to simulate the RF effects of RF exposure under worst-case conditions. Precise laboratory measures were taken to assure repeatability of the tests. The results and statements relate only to the item(s) tested.

Please note that the absorption and distribution of electromagnetic energy in the body are very complex phenomena that depend on the mass, shape, and size of the body, the orientation of the body with respect to the field vectors, and the electrical properties of both the body and the environment. Other variables that may play a substantial role in possible biological effects are those that characterize the environment (e.g., ambient temperature, air velocity, relative humidity, and body insulation) and those that characterize the individual (e.g., age, gender, activity level, debilitation, or disease). Because various factors may interact with one another to vary the specific biological outcome of an exposure to electromagnetic fields, any protection guide should consider maximal amplification of biological effects as a result of field-body interactions, environmental conditions, and physiological variables. [3]

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