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RF EXPOSURE REPORT

Applicant Name:

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

Date of Testing:

07/16/2025 – 08/13/2025

Test Report Issue Date:

08/29/2025

Test Site/Location:

Element, Morgan Hill, CA, USA

Document Serial No.:

1C2504170044-07.BCG-R1

FCC ID:**BCG-A3064****APPLICANT:****APPLE, INC.****DUT Type:**

Wireless Earbud

Application Type:

Certification

FCC Rule Part(s):

CFR §2.1093

Model:

A3064

Equipment Class	Band & Mode	Tx Frequency	SAR	
			1g Head (W/kg)	1g Body-Worn (W/kg)
DSS/DTS	2.4 GHz Bluetooth	2404 - 2476 MHz	0.15	0.36
NII	NB U-NII 1	5157 - 5245 MHz	<0.1	0.24
NII	NB U-NII 3	5731 - 5844 MHz	<0.1	0.20
6VL	NB U-NII 5	6108 - 6420 MHz	<0.1	<0.1
Equipment Class	Band & Mode	Tx Frequency	APD (W/m ²)	APD (W/m ²)
6VL	NB U-NII 5	6108 - 6420 MHz	<0.1	0.16
Equipment Class	Band & Mode	Tx Frequency	Reported PD (W/m ²)	Reported PD (W/m ²)
6VL	NB U-NII 5	6108 - 6420 MHz	0.36	0.42

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 Ortanze

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.

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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)	
		Maximum	Nominal
Bluetooth BDR	34%	16.00	15.00
		13.00	12.00
Bluetooth EDR	77%	13.00	12.00
		12.00	12.00
Bluetooth HDR4/8 1-Slot	34%	13.00	12.00
		12.00	12.00
Bluetooth HDR4/8 3/5-Slot	77%	13.00	12.00
		12.00	12.00
Bluetooth HDRp4/p8	100%	13.00	12.00
		12.00	12.00
Bluetooth LE1M	100%	9.50	8.50
		8.50	8.50
Bluetooth LE2M	15%	9.50	8.50
		8.50	8.50

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Mode / Band		Duty Cycle	Modulated Average (dBm)	
NB UNII-1 BDR		34%	Maximum	10.00
			Nominal	9.00
NB UNII-1 HDR4/8 1-Slot		34%	Maximum	10.00
			Nominal	9.00
NB UNII-1 HDR4/8 3/5-Slot		77%	Maximum	10.00
			Nominal	9.00
NB UNII-1 HDRp4/p8		100%	Maximum	10.00
NB UNII-1 LE1M		100%	Nominal	9.00
			Maximum	10.00
NB UNII-1 LE2M		15%	Nominal	9.00
			Maximum	10.00

Mode / Band		Duty Cycle	Modulated Average (dBm)	
NB UNII-3 BDR		34%	Maximum	13.00
			Nominal	12.00
NB UNII-3 HDR4/8 1-Slot		34%	Maximum	10.00
			Nominal	9.00
NB UNII-3 HDR4/8 3/5-Slot		77%	Maximum	10.00
			Nominal	9.00
NB UNII-3 HDRp4/p8		100%	Maximum	10.00
NB UNII-3 LE1M		100%	Nominal	9.00
			Maximum	13.00
NB UNII-3 LE2M		15%	Nominal	12.00
			Maximum	13.00

Mode / Band	Duty Cycle	Modulated Average (dBm)		Modulated Average (dBm)		Modulated Average (dBm)	
		6108 MHz (Low)		6185 MHz (Low-Mid) & 6264 MHz (Mid)		6342 MHz (Mid-High) & 6420 MHz (High)	
NB UNII-5 BDR	34%	Maximum	-4.50	Maximum	-4.25	Maximum	-3.50
NB UNII-5 BDR		Nominal	-5.50	Nominal	-5.25	Nominal	-4.50
NB UNII-5 HDR4 1-Slot	34%	Maximum	-2.00	Maximum	-1.75	Maximum	-1.00
NB UNII-5 HDR4 1-Slot		Nominal	-3.00	Nominal	-2.75	Nominal	-2.00
NB UNII-5 HDR8 1-Slot	34%	Maximum	0.50	Maximum	0.75	Maximum	1.50
NB UNII-5 HDR8 1-Slot		Nominal	-0.50	Nominal	-0.25	Nominal	0.50
NB UNII-5 HDR4 3-Slot	77%	Maximum	-2.00	Maximum	-1.75	Maximum	-1.00
NB UNII-5 HDR4 3-Slot		Nominal	-3.00	Nominal	-2.75	Nominal	-2.00
NB UNII-5 HDR8 3-Slot	77%	Maximum	0.50	Maximum	0.75	Maximum	1.50
NB UNII-5 HDR8 3-Slot		Nominal	-0.50	Nominal	-0.25	Nominal	0.50
NB UNII-5 HDR4 5-Slot	77%	Maximum	-2.00	Maximum	-1.75	Maximum	-1.00
NB UNII-5 HDR4 5-Slot		Nominal	-3.00	Nominal	-2.75	Nominal	-2.00
NB UNII-5 HDR8 5-Slot	77%	Maximum	0.50	Maximum	0.75	Maximum	1.50
NB UNII-5 HDR8 5-Slot		Nominal	-0.50	Nominal	-0.25	Nominal	0.50
NB UNII-5 HDRp4	100%	Maximum	-2.00	Maximum	-1.75	Maximum	-1.00
NB UNII-5 HDRp4		Nominal	-3.00	Nominal	-2.75	Nominal	-2.00
NB UNII-5 HDRp8	100%	Maximum	0.50	Maximum	0.75	Maximum	1.50
NB UNII-5 HDRp8		Nominal	-0.50	Nominal	-0.25	Nominal	0.50
NB UNII-5 LE1M	100%	Maximum	-4.50	Maximum	-4.25	Maximum	-3.50
NB UNII-5 LE1M		Nominal	-5.50	Nominal	-5.25	Nominal	-4.50
NB UNII-5 LE2M	15%	Maximum	-4.50	Maximum	-4.25	Maximum	-3.50
NB UNII-5 LE2M		Nominal	-5.50	Nominal	-5.25	Nominal	-4.50

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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-A3064 – which is a wireless 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)
- SPEAG DASY6 System Handbook
- SPEAG DASY6 Application Note (Interim Procedures for Devices Operating at 6-10 GHz) (Nov 2021)
- IEEE 1528-2013
- IEC TR 63170:2018
- IEC 62479:2010

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 (ρ). 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:

σ = conductivity of the tissue-simulating material (S/m)

ρ = mass density of the tissue-simulating material (kg/m³)

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 completed 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) ($\Delta x_{area}, \Delta y_{area}$)	Maximum Zoom Scan Resolution (mm) ($\Delta x_{zoom}, \Delta y_{zoom}$)	Maximum Zoom Scan Spatial Resolution (mm)			Minimum Zoom Scan Volume (mm) (x,y,z)
			Uniform Grid		Graded Grid	
			$\Delta z_{zoom}(n)$	$\Delta z_{zoom}(1)^*$	$\Delta z_{zoom}(n>1)^*$	
≤ 2 GHz	≤ 15	≤ 8	≤ 5	≤ 4	≤ 1.5* $\Delta z_{zoom}(n-1)$	≥ 30
2-3 GHz	≤ 12	≤ 5	≤ 5	≤ 4	≤ 1.5* $\Delta z_{zoom}(n-1)$	≥ 30
3-4 GHz	≤ 12	≤ 5	≤ 4	≤ 3	≤ 1.5* $\Delta z_{zoom}(n-1)$	≥ 28
4-5 GHz	≤ 10	≤ 4	≤ 3	≤ 2.5	≤ 1.5* $\Delta z_{zoom}(n-1)$	≥ 25
5-6 GHz	≤ 10	≤ 4	≤ 2	≤ 2	≤ 1.5* $\Delta z_{zoom}(n-1)$	≥ 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 5 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 5 mm between the back side of the earbud and the flat phantom. Additional test positions were evaluated for a more conservative analysis. The test positions for the different orientations are labeled as follows: left and right. 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.

5.3 RF Exposure Limits for Frequencies Below 6 GHz

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)
Peak Spatial Average SAR Head	1.6	8.0
Whole Body SAR	0.08	0.4
Peak Spatial Average SAR 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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5.4 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/m² or mW/cm².

Peak Spatially Averaged Power Density was evaluated over a circular area of 4 cm² 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

Human Exposure to Radiofrequency (RF) Radiation Limits		
Frequency Range [MHz]	Power Density [mW/cm²]	Average Time [Minutes]
(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/cm² is 10 W/m²

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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]	Data Rate [Mbps]	Channel No.	Avg Conducted Power	
			[dBm]	[mW]
2404	4.0	1	12.75	18.836
2441	4.0	38	12.76	18.880
2476	4.0	73	12.54	17.947

Table 7-2
NB UNII Average RF Power

Band	Frequency	Channel	Average
U-NII 1	5157	Low	9.10
	5200	Mid	9.01
	5245	High	9.02
U-NII 3	5731	Low	12.57
	5788	Mid	12.73
	5844	High	12.46
U-NII 5	6108	Low	0.00
	6185	Low-Mid	0.31
	6264	Mid	0.51
	6342	Mid-High	0.50
	6420	High	0.26

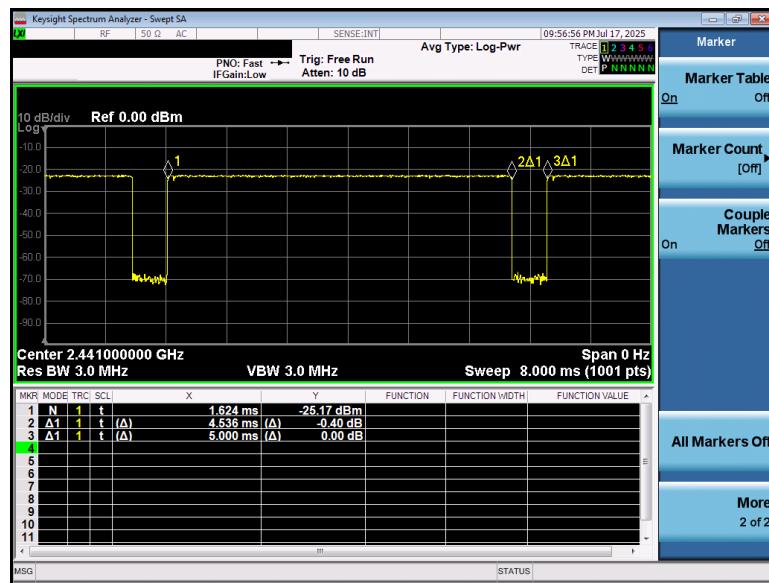
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7.2 Bluetooth/NB UNII Duty Cycle Plots

Figure 7-1
2.4 GHz Bluetooth Transmission Plot



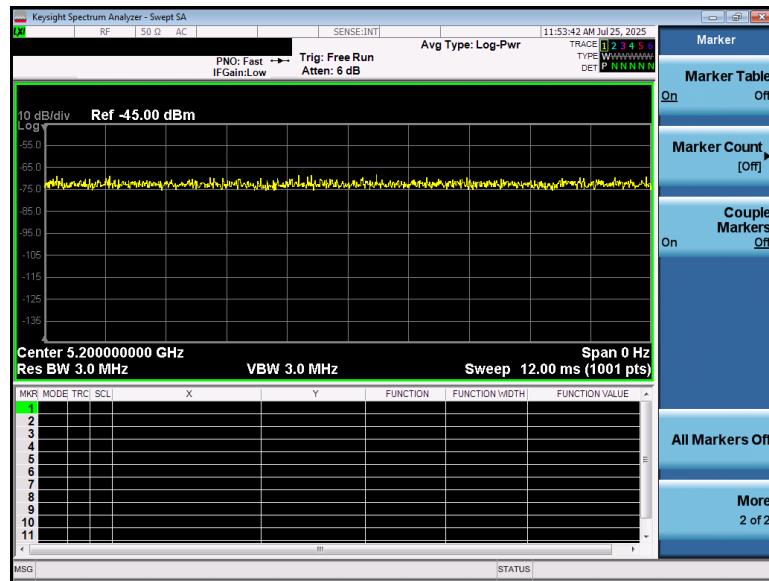
Equation 7-1
2.4 GHz Bluetooth Duty Cycle Calculation

$$\text{Duty Cycle} = \frac{\text{Pulse Width}}{\text{Period}} * 100\% = \frac{4.536 \text{ ms}}{5.000 \text{ ms}} * 100\% = 90.72\%$$

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Figure 7-2
NB UNII-1 Transmission Plot



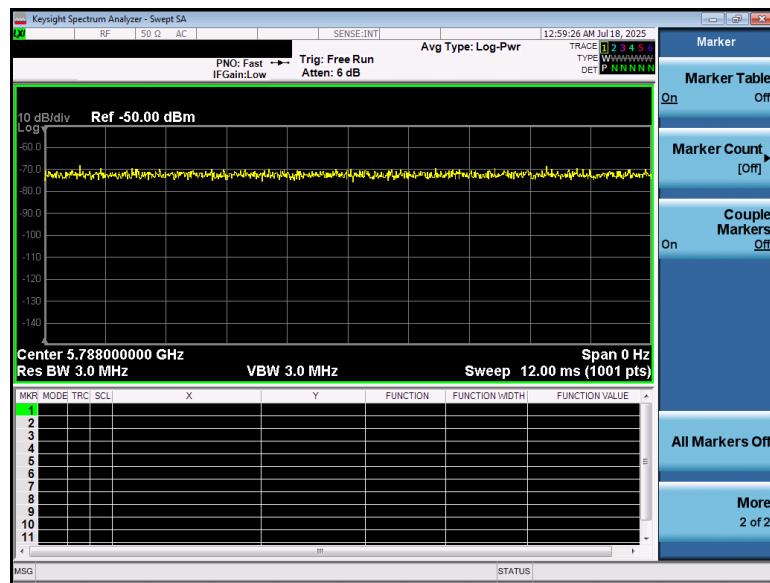
Equation 7-2
NB UNII-1 Duty Cycle Calculation

$$\text{Duty Cycle} = 100\%$$

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**Figure 7-3
NB UNII-3 Transmission Plot**



**Equation 7-3
NB UNII-3 Duty Cycle Calculation**

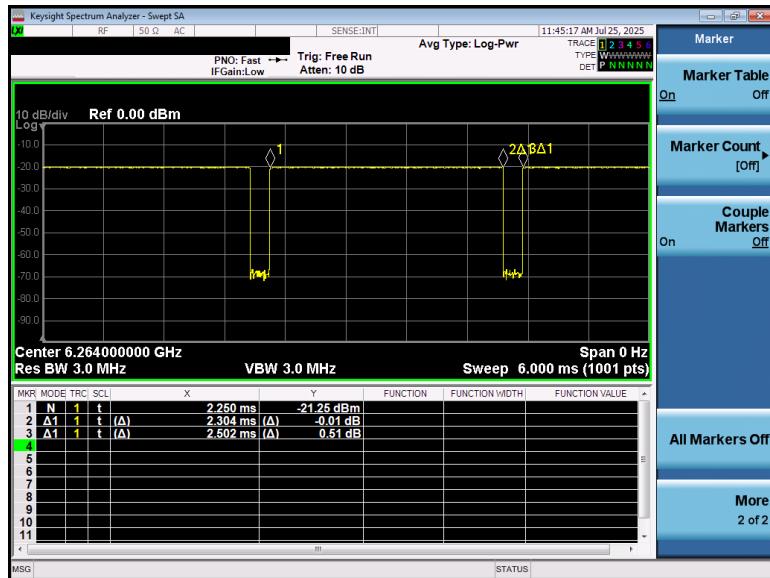
$$\text{Duty Cycle} = 100\%$$

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Figure 7-4
NB UNII-5 Transmission Plot



Equation 7-4
NB UNII-5 Duty Cycle Calculation

$$\text{Duty Cycle} = \frac{\text{Pulse Width}}{\text{Period}} * 100\% = \frac{2.304 \text{ ms}}{2.502 \text{ ms}} * 100\% = 92.09\%$$

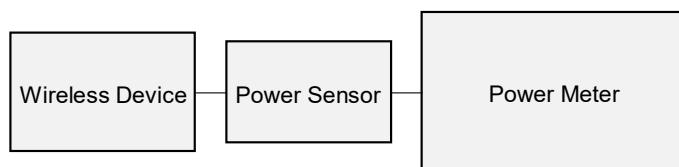


Figure 7-4
Power Measurement Setup

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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, σ (S/m)	Measured Dielectric Constant, ε	TARGET Conductivity, σ (S/m)	TARGET Dielectric Constant, ε	% dev σ	% dev ε
7/20/2025	2450 Head	19.0	2300	1.673	39.895	1.670	39.500	0.18%	1.00%
			2310	1.682	39.870	1.679	39.480	0.18%	0.99%
			2320	1.690	39.851	1.687	39.460	0.18%	0.99%
			2400	1.737	39.745	1.756	39.289	-1.08%	1.16%
			2450	1.785	39.701	1.800	39.200	-0.83%	1.28%
			2480	1.806	39.661	1.833	39.162	-1.47%	1.27%
			2500	1.818	39.604	1.855	39.136	-1.99%	1.20%
			2510	1.826	39.575	1.866	39.123	-2.14%	1.16%
			2535	1.846	39.509	1.893	39.092	-2.48%	1.07%
			2550	1.859	39.482	1.909	39.073	-2.62%	1.05%
			2560	1.867	39.473	1.920	39.060	-2.76%	1.06%
			2600	1.892	39.428	1.964	39.009	-3.67%	1.07%
			2650	1.935	39.289	2.018	38.945	-4.11%	0.88%
			2680	1.960	39.256	2.051	38.907	-4.44%	0.90%
			2700	1.974	39.239	2.073	38.882	-4.78%	0.92%
7/16/2025	5200-5800 Head	19.6	5150	4.564	35.386	4.608	36.050	-0.95%	-1.84%
			5160	4.577	35.372	4.618	36.040	-0.89%	-1.85%
			5170	4.591	35.348	4.629	36.030	-0.82%	-1.89%
			5180	4.604	35.316	4.635	36.009	-0.67%	-1.92%
			5190	4.614	35.289	4.645	35.998	-0.67%	-1.97%
			5200	4.624	35.282	4.655	35.986	-0.67%	-1.96%
			5210	4.630	35.274	4.666	35.975	-0.77%	-1.95%
			5220	4.641	35.260	4.676	35.963	-0.75%	-1.95%
			5240	4.667	35.205	4.696	35.940	-0.62%	-2.05%
			5250	4.680	35.193	4.706	35.929	-0.55%	-2.05%
			5260	4.690	35.170	4.717	35.917	-0.57%	-2.08%
			5270	4.699	35.142	4.727	35.906	-0.59%	-2.13%
			5280	4.714	35.121	4.737	35.894	-0.49%	-2.15%
			5290	4.724	35.097	4.748	35.883	-0.51%	-2.19%
			5300	4.733	35.075	4.758	35.871	-0.53%	-2.22%
			5310	4.745	35.068	4.768	35.860	-0.48%	-2.21%
			5320	4.758	35.060	4.778	35.849	-0.42%	-2.20%
			5500	4.963	34.696	4.963	35.643	0.00%	-2.66%
			5510	4.969	34.677	4.973	35.632	-0.08%	-2.68%
			5520	4.979	34.665	4.983	35.620	-0.08%	-2.68%
			5530	4.987	34.639	4.994	35.609	-0.14%	-2.72%
			5540	4.998	34.612	5.004	35.597	-0.12%	-2.77%
			5550	5.012	34.589	5.014	35.586	-0.04%	-2.80%
			5560	5.024	34.569	5.024	35.574	0.00%	-2.83%
			5580	5.046	34.532	5.045	35.551	0.02%	-2.87%
			5600	5.079	34.477	5.065	35.529	0.28%	-2.96%
			5610	5.092	34.465	5.076	35.518	0.32%	-2.96%
			5620	5.103	34.460	5.086	35.506	0.33%	-2.95%
			5640	5.127	34.418	5.106	35.483	0.41%	-3.00%
			5660	5.154	34.370	5.127	35.460	0.53%	-3.07%
			5670	5.164	34.360	5.137	35.449	0.53%	-3.07%
			5680	5.170	34.348	5.147	35.437	0.45%	-3.07%
			5690	5.178	34.324	5.158	35.426	0.39%	-3.11%
			5700	5.190	34.289	5.168	35.414	0.43%	-3.18%
			5710	5.204	34.260	5.178	35.403	0.50%	-3.23%
			5720	5.216	34.245	5.188	35.391	0.54%	-3.24%
			5745	5.248	34.200	5.214	35.363	0.65%	-3.29%
			5750	5.256	34.186	5.219	35.357	0.71%	-3.31%
			5755	5.264	34.172	5.224	35.351	0.77%	-3.34%
			5765	5.277	34.164	5.234	35.340	0.82%	-3.33%
			5775	5.288	34.156	5.245	35.329	0.82%	-3.32%
			5785	5.294	34.137	5.255	35.317	0.74%	-3.34%
			5795	5.302	34.108	5.265	35.305	0.70%	-3.39%
			5800	5.310	34.093	5.270	35.300	0.76%	-3.42%
			5805	5.316	34.075	5.275	35.294	0.78%	-3.45%
			5825	5.344	34.042	5.296	35.271	0.91%	-3.48%
			5835	5.355	34.024	5.305	35.230	0.94%	-3.42%
			5845	5.365	34.011	5.315	35.210	0.94%	-3.41%
			5850	5.373	33.998	5.320	35.200	1.00%	-3.41%
			5855	5.380	33.990	5.325	35.197	1.03%	-3.43%
			5865	5.394	33.967	5.336	35.190	1.09%	-3.48%
			5865	5.394	33.967	5.336	35.190	1.09%	-3.48%
			5875	5.405	33.953	5.347	35.183	1.08%	-3.50%
			5885	5.417	33.932	5.357	35.177	1.12%	-3.54%
			5905	5.436	33.891	5.379	35.163	1.06%	-3.62%

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Table 8-2
Measured Head Tissue Properties

Calibrated for Tests Performed on:	Tissue Type	Tissue Temp During Calibration (°C)	Measured Frequency (MHz)	Measured Conductivity, σ (S/m)	Measured Dielectric Constant, ϵ	TARGET Conductivity, σ (S/m)	TARGET Dielectric Constant, ϵ	% dev σ	% dev ϵ
08/11/2025	6000 Head	21.0	5935	5.169	35.613	5.411	35.143	-4.47%	1.34%
			5970	5.206	35.564	5.448	35.120	-4.44%	1.26%
			5985	5.222	35.557	5.464	35.110	-4.43%	1.27%
			6000	5.240	35.545	5.480	35.100	-4.38%	1.27%
			6025	5.275	35.498	5.510	35.070	-4.26%	1.22%
			6185	5.464	35.197	5.698	34.878	-4.11%	0.91%
			6275	5.579	35.052	5.805	34.770	-3.89%	0.81%
			6285	5.585	35.041	5.816	34.758	-3.97%	0.81%
			6305	5.602	35.000	5.840	34.734	-4.08%	0.77%
			6345	5.665	34.928	5.887	34.686	-3.77%	0.70%
			6475	5.814	34.728	6.041	34.530	-3.76%	0.57%
			6485	5.826	34.718	6.052	34.518	-3.73%	0.58%
			6500	5.838	34.700	6.070	34.500	-3.82%	0.58%
			6505	5.842	34.693	6.076	34.494	-3.85%	0.58%
			6545	5.887	34.605	6.122	34.446	-3.84%	0.46%
			6665	6.037	34.424	6.265	34.302	-3.64%	0.36%
			6675	6.051	34.403	6.273	34.290	-3.54%	0.33%
			6685	6.064	34.389	6.285	34.278	-3.52%	0.32%
			6715	6.097	34.343	6.319	34.242	-3.51%	0.29%
			6785	6.180	34.210	6.400	34.158	-3.44%	0.15%
			6825	6.230	34.194	6.447	34.110	-3.37%	0.25%
			6985	6.404	33.914	6.633	33.918	-3.45%	-0.01%
			6995	6.415	33.893	6.644	33.906	-3.45%	-0.04%
			7000	6.422	33.884	6.650	33.900	-3.43%	-0.05%
			7005	6.430	33.877	6.656	33.894	-3.40%	-0.05%
			7025	6.457	33.866	6.680	33.870	-3.34%	-0.01%
			7500	7.013	33.108	7.240	33.300	-3.14%	-0.58%
			7980	7.605	32.300	7.816	32.724	-2.70%	-1.30%

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.

Note: 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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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 8-3
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 SAR 1g (W/kg)	1W Target SAR 1g (W/kg)	1W Normalized SAR 1g (W/kg)	Deviation 1g (%)	
AM11	2450	HEAD	07/20/2025	20.5	19.4	0.10	855	7551	1323	5.040	52.400	50.400	-3.82%	
AM8	5250	HEAD	07/16/2025	20.5	19.1	0.05	1066	7499	1465	3.690	77.900	73.800	-5.26%	
AM8	5600	HEAD	07/16/2025	20.5	19.1	0.05	1066	7499	1465	4.100	81.800	82.000	0.24%	
AM8	5750	HEAD	07/16/2025	20.5	19.1	0.05	1066	7499	1465	3.900	80.700	78.000	-3.35%	
AM8	5850	HEAD	07/16/2025	20.5	19.1	0.05	1066	7499	1465	3.730	77.400	74.600	-3.62%	
AM2	6500	HEAD	08/11/2025	22.1	20.9	0.03	1019	3949	1684	7.340	300.000	293.600	-2.13%	
											32.7	1340	1308	-2.39%

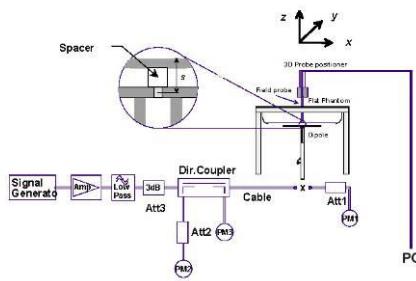


Figure 8-1
System Verification Setup Diagram



Figure 8-2
System Verification Setup Photo

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8.3 Power Density Test System Verification

The system was verified to be within ± 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.

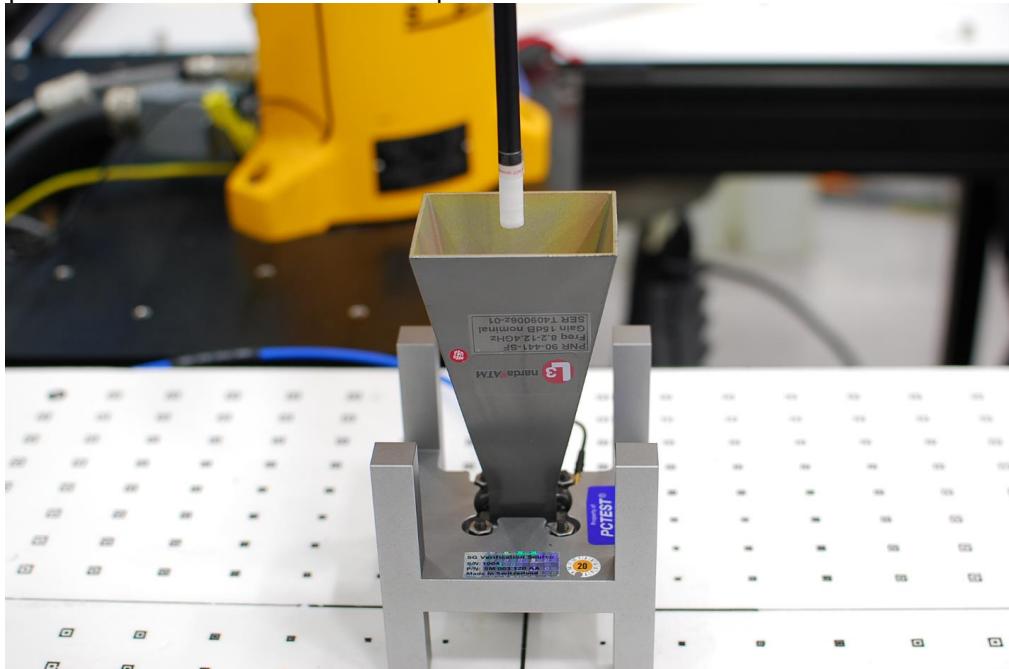


Figure 8-3
System Verification Setup Photo

Table 8-4
10 GHz Verification Results

System Verification												
System	Frequency (GHz)	Date	Source S/N	DAE S/N	Probe S/N	Prad (mW)	Normal psPD (W/m ² over 4 cm ²)		Deviation (dB)	Total psPD (W/m ² over 4 cm ²)		Deviation (dB)
							Measured	Target		Measured	Target	
AMS	10	08/13/2025	1006 - 10/8/2024	1402	9407	93.3	62.40	57.90	0.33	62.60	58.10	0.32

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]	Measured 10g SAR [W/kg]	Power Scaling Factor	Duty Cycle Scaling Factor	Reported 1g SAR [W/kg]	Reported 10g SAR [W/kg]	Plot #
Head	2.4 GHz Bluetooth	Left	HSRHH4000TN	90.72	-0.04	2441.00	38	4	13.00	12.76	Front	5	0.190	0.061	1.057	1.102	0.153	0.071	A1

ANSI/IEEE C95.1 1992 - SAFETY LIMIT
Spatial Peak
Uncontrolled Exposure/General Population

Head
1.6 W/kg (mW/g)
averaged over 1 gram

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]	Measured 10g SAR [W/kg]	Power Scaling Factor	Duty Cycle Scaling Factor	Reported 1g SAR [W/kg]	Reported 10g SAR [W/kg]	Plot #
Head	NB U-NII 1	Left	HSRHH6001CV	100	0.06	5157.00	Low	1	10.00	9.10	Front	5	0.016	0.005	1.330	1.000	0.020	0.006	A2

ANSI/IEEE C95.1 1992 - SAFETY LIMIT
Spatial Peak
Uncontrolled Exposure/General Population

Head
1.6 W/kg (mW/g)
averaged over 1 gram

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]	Measured 10g SAR [W/kg]	Power Scaling Factor	Duty Cycle Scaling Factor	Reported 1g SAR [W/kg]	Reported 10g SAR [W/kg]	Plot #
Head	NB U-NII 3	Left	HSRHH6001CV	100	0.03	5788.00	Mid	1	13.00	12.73	Front	5	0.017	0.004	1.064	1.000	0.018	0.004	A3

ANSI/IEEE C95.1 1992 - SAFETY LIMIT
Spatial Peak
Uncontrolled Exposure/General Population

Head
1.6 W/kg (mW/g)
averaged over 1 gram

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]	Measured 10g SAR [W/kg]	Power Scaling Factor	Duty Cycle Scaling Factor	Reported 1g SAR [W/kg]	Reported 10g SAR [W/kg]	Plot #
Head	NB U-NII 5	Left	HSRHH6001CV	92.09	0.09	6420.00	High	8	1.50	0.26	Front	5	0.001	0.000	1.330	1.086	0.001	0.000	
Head	NB U-NII 5	Left	HSRHH6001CV	92.09	0.05	6108.00	Low	8	0.50	0.00	Front	5	0.008	0.000	1.122	1.086	0.000	0.000	A4
Head	NB U-NII 5	Left	HSRHH6001CV	92.09	0.05	6195.00	Low-Mid	8	1.50	0.31	Front	5	0.010	0.000	1.107	1.086	0.004	0.000	
Head	NB U-NII 5	Left	HSRHH6001CV	92.09	0.06	6264.00	Mid	8	0.75	0.51	Front	5	0.001	0.000	1.057	1.086	0.001	0.000	
Head	NB U-NII 5	Left	HSRHH6001CV	92.09	0.02	6342.00	Mid-High	8	1.50	0.50	Front	5	0.002	0.000	1.259	1.086	0.003	0.000	

ANSI/IEEE C95.1 1992 - SAFETY LIMIT
Spatial Peak
Uncontrolled Exposure/General Population

Head
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 ² (4cm ²)]	Power Scaling Factor	Duty Cycle Scaling Factor	Reported APD [W/m ² (4cm ²)]	
Head	NB U-NII 5	Left	HSRHH6001CV	92.09	0.09	6420.00	High	8	1.50	0.26	Front	5	0.009	1.330	1.086	0.013	
Head	NB U-NII 5	Left	HSRHH6001CV	92.09	0.05	6108.00	Low	8	0.50	0.00	Front	5	0.072	1.122	1.086	0.088	
Head	NB U-NII 5	Left	HSRHH6001CV	92.09	0.05	6195.00	Low-Mid	8	1.50	0.31	Front	5	0.016	1.107	1.086	0.019	
Head	NB U-NII 5	Left	HSRHH6001CV	92.09	0.06	6264.00	Mid	8	0.75	0.51	Front	5	0.013	1.057	1.086	0.015	
Head	NB U-NII 5	Left	HSRHH6001CV	92.09	0.02	6342.00	Mid-High	8	1.50	0.50	Front	5	0.021	1.259	1.086	0.029	

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]	Measured 10g SAR [W/kg]	Power Scaling Factor	Duty Cycle Scaling Factor	Reported 1g SAR [W/kg]	Reported 10g SAR [W/kg]	Plot #
Body-worn	2.4 GHz Bluetooth	Left	HSRHH4000TN	90.72	-0.02	2441.00	38	4	13.00	12.76	Back	5	0.242	0.097	1.057	1.102	0.282	0.113	
Body-worn	2.4 GHz Bluetooth	Left	HSRHH4000TN	90.72	-0.01	2441.00	38	4	13.00	12.76	Right	5	0.273	0.120	1.057	1.102	0.318	0.140	
Body-worn	2.4 GHz Bluetooth	Left	HSRHH4000TN	90.72	0.01	2441.00	38	4	13.00	12.76	Left	5	0.309	0.135	1.057	1.102	0.360	0.157	A5
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]	Measured 10g SAR [W/kg]	Power Scaling Factor	Duty Cycle Scaling Factor	Reported 1g SAR [W/kg]	Reported 10g SAR [W/kg]	Plot #
Body-worn	NB U-NII 1	Left	HSRHH6001CV	100	0.08	5157.00	Low	1	10.00	9.10	Back	5	0.197	0.055	1.230	1.000	0.242	0.068	A6
Body-worn	NB U-NII 1	Left	HSRHH6001CV	100	-0.04	5157.00	Low	1	10.00	9.10	Right	5	0.092	0.028	1.230	1.000	0.113	0.034	
Body-worn	NB U-NII 1	Left	HSRHH6001CV	100	0.03	5157.00	Low	1	10.00	9.10	Left	5	0.196	0.054	1.230	1.000	0.241	0.066	
ANSI/IEEE C95.1 1992 - SAFETY LIMIT Spatial Peak Uncontrolled Exposure/General Population																			
Body 1.6 W/kg (mW/g) averaged over 1 gram																			

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]	Measured 10g SAR [W/kg]	Power Scaling Factor	Duty Cycle Scaling Factor	Reported 1g SAR [W/kg]	Reported 10g SAR [W/kg]	Plot #
Body-worn	NB U-NII 3	Left	HSRHH6001CV	100	0.12	5708.00	Mid	1	13.00	12.73	Back	5	0.192	0.051	1.064	1.000	0.204	0.054	A7
Body-worn	NB U-NII 3	Left	HSRHH6001CV	100	0.01	5708.00	Mid	1	13.00	12.73	Right	5	0.143	0.040	1.064	1.000	0.152	0.043	
Body-worn	NB U-NII 3	Left	HSRHH6001CV	100	0.06	5708.00	Mid	1	13.00	12.73	Left	5	0.128	0.036	1.064	1.000	0.136	0.038	
ANSI/IEEE C95.1 1992 - SAFETY LIMIT Spatial Peak Uncontrolled Exposure/General Population																			
Body 1.6 W/kg (mW/g) averaged over 1 gram																			

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]	Measured 10g SAR [W/kg]	Power Scaling Factor	Duty Cycle Scaling Factor	Reported 1g SAR [W/kg]	Reported 10g SAR [W/kg]	Plot #
Body-worn	NB U-NII 5	Left	HSRHH6001CV	92.09	0.07	6420.00	High	8	1.50	0.26	Back	5	0.018	0.004	1.330	1.086	0.026	0.006	
Body-worn	NB U-NII 5	Left	HSRHH6001CV	92.09	0.02	6108.00	Low	8	0.50	0.00	Back	5	0.021	0.005	1.122	1.086	0.026	0.006	A8
Body-worn	NB U-NII 5	Left	HSRHH6001CV	92.09	0.02	6185.00	Low-Mid	8	0.75	0.31	Back	5	0.017	0.006	1.107	1.086	0.020	0.007	
Body-worn	NB U-NII 5	Left	HSRHH6001CV	92.09	0.02	6185.00	Mid	8	0.75	0.31	Back	5	0.020	0.006	1.076	1.086	0.022	0.006	
Body-worn	NB U-NII 5	Left	HSRHH6001CV	92.09	0.01	6312.00	Mid-High	8	1.50	0.50	Back	5	0.019	0.005	1.259	1.086	0.026	0.007	
Body-worn	NB U-NII 5	Left	HSRHH6001CV	92.09	0.05	6264.00	Mid	8	0.75	0.31	Right	5	0.016	0.004	1.057	1.086	0.018	0.005	
Body-worn	NB U-NII 5	Left	HSRHH6001CV	92.09	0.02	6264.00	Mid	8	0.75	0.51	Left	5	0.009	0.003	1.057	1.086	0.010	0.003	
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.

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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 (A3064).
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.
8. The orange highlights throughout the report represent 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 Standalone psPD

Table 9-9

MEASUREMENT RESULTS																					
Frequency (MHz)	Channel	Mode	Maximum Allowed Power (dBm)	Conducted Power (dBm)	Power Drift (dB)	Spacing (mm)	Earbud	DUT Serial Number	Data Rate (Mbps)	Side	Duty Cycle (%)	Grid Step (A)	iPD (W/m ²)	Scaling Factor for Measurement Uncertainty per IEC 62479	Scaling Factor (Power)	Scaling Factor (Duty Cycle)	Normal psPD (W/m ²)	Scaled Normal psPD (W/m ²)	Total psPD (W/m ²)	Scaled Total psPD (W/m ²)	Plot #
6108.00	Low	NB U-NII 5	0.50	0.00	-0.03	2	Left	H5RH6001CV	8	Back	92.09	0.25	0.83	1.554	1.122	1.086	0.213	0.403	0.220	0.417	A9
6108.00	Low	NB U-NII 5	0.50	0.00	-0.06	9.82	Left	H5RH6001CV	8	Back	92.09	0.25	0.82	1.554	1.122	1.086	0.108	0.205	0.136	0.258	
6108.00	Low	NB U-NII 5	0.50	0.00	0.21	2	Left	H5RH6001CV	8	Front	92.09	0.25	1.21	1.554	1.122	1.086	0.175	0.331	0.190	0.360	
47 CFR §1-1310 - SAFETY LIMIT Spatial Average Uncontrolled Exposure / General Population								Power Density 10 W/m ² averaged over 4 cm ²													

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 on 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. PTP-PR algorithm was used during psPD measurement and calculations
8. Per KDB 388624 D02, the OVER6G checklist was simplified for the 6-8.5 GHz range by requiring a single power density measurement in correspondence to the largest SAR value that was measured. Therefore, PD testing was evaluated for the worst case cfg. per mode/band and exposure condition from the SAR testing.

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10 SAR MEASUREMENT VARIABILITY

10.1 Measurement Variability

Per FCC KDB Publication 865664 D01v01r04, SAR measurement variability was not assessed since all measured SAR values are <0.8W/kg for 1g and <0.2 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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11 EQUIPMENT LIST

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	10/23/2024	Annual	10/23/2025	MY45093852
Agilent	E4438C	ESG Vector Signal Generator	11/15/2024	Annual	11/15/2025	MY45092078
Agilent	N5182A	MXG Vector Signal Generator	5/30/2025	Annual	5/30/2026	MY48180366
Agilent	N5182A	MXG Vector Signal Generator	12/5/2024	Annual	12/5/2025	US46240505
Agilent	8753ES	S-Parameter Vector Network Analyzer	1/6/2025	Annual	1/6/2026	MY40001472
Agilent	8753ES	S-Parameter Vector Network Analyzer	9/25/2024	Annual	9/25/2025	MY40003841
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	6/27/2025	Annual	6/27/2026	1840005
Anritsu	ML2495A	Power Meter	7/3/2025	Annual	7/3/2026	1039008
Anritsu	MA2411B	Pulse Power Sensor	9/5/2024	Annual	9/5/2025	1726262
Anritsu	MA2411B	Pulse Power Sensor	10/21/2024	Annual	10/21/2025	1027293
Anritsu	MA24106A	USB Power Sensor	5/29/2025	Annual	5/29/2026	1344554
Anritsu	MA24106A	USB Power Sensor	10/29/2024	Annual	10/29/2025	1248508
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	10/15/2024	Biennial	10/15/2026	240763503
Control Company	4040	Therm./ Clock/ Humidity Monitor	4/15/2024	Biennial	4/15/2026	240310282
Keysight Technologies	N9020A	MXA Signal Analyzer	7/7/2025	Annual	7/7/2026	MY48010233
Agilent	N9020A	MXA Signal Analyzer	7/7/2025	Biennial	7/7/2027	MY56470202
Control Company	1235C55	Digital Caliper	2/25/2025	Biennial	2/25/2027	711245294
MCL	BW-N6W5+	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	VLF-6000+	Low Pass Filter DC to 6000 MHz	7/3/2025	Annual	7/3/2026	31634
Mini-Circuits	BW-N20W5+	DC to 18 GHz Precision Fixed 20 dB Attenuator	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	4/2/2024	Biennial	4/2/2026	1262
SPEAG	DAK-3.5	Dielectric Assessment Kit	11/5/2024	Annual	11/5/2025	1277
SPEAG	DAKS-3.5	Portable Dielectric Assessment Kit	11/5/2024	Annual	11/5/2025	1277
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	D2450V2	2450 MHz SAR Dipole	11/15/2022	Triennial	11/15/2025	855
SPEAG	D5GHzV2	5 GHz SAR Dipole	11/8/2024	Annual	11/8/2025	1066
SPEAG	D6.5GHzV2	6.5 GHz SAR Dipole	10/10/2024	Annual	10/10/2025	1019
SPEAG	5G Verification Source 10GHz	10GHz System Verification Antenna	10/8/2024	Annual	10/8/2025	1006
SPEAG	DAE4	Dasy Data Acquisition Electronics	1/8/2025	Annual	1/8/2026	1465
SPEAG	DAE4	Dasy Data Acquisition Electronics	4/15/2025	Annual	4/15/2026	1323
SPEAG	DAE4	Dasy Data Acquisition Electronics	9/4/2024	Annual	9/4/2025	1684
SPEAG	DAE4	Dasy Data Acquisition Electronics	4/10/2025	Annual	4/10/2026	1402
SPEAG	EX3DV4	SAR Probe	4/16/2025	Annual	4/16/2026	7551
SPEAG	EX3DV4	SAR Probe	1/14/2025	Annual	1/14/2026	7499
SPEAG	EX3DV4	SAR Probe	9/9/2024	Annual	9/9/2025	3949
SPEAG	EUmmWV4	mmWave Probe	10/9/2024	Annual	10/9/2025	9407

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. Each equipment item was used solely within its respective calibration period.

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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_i 1gm	c_i 10 gms	1gm u_i (± %)	10gms u_i (± %)	v_i
Measurement System									
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	∞
Test Sample Related									
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	∞
Phantom & Tissue Parameters									
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	∞
Combined Standard Uncertainty (k=1)						RSS		12.2	12.0
Expanded Uncertainty (95% CONFIDENCE LEVEL)						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	
Uncertainty Component	IEEE 1528 Sec.	Tol. (± %)	Prob. Dist.	Div.	c_i 1gm	c_i 10 gms	1gm u_i (± %)	10gms u_i (± %)	v_i	
Measurement System										
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	∞	
Test Sample Related										
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	∞	
Phantom & Tissue Parameters										
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	∞	
Combined Standard Uncertainty (k=1)							RSS	13.8	13.6	191
Expanded Uncertainty (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 _i	u _i (± dB)	v _i
Measurement System						
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	∞
Test Sample Related						
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	∞
Combined Standard Uncertainty (k=1)					RSS	1.34
Expanded Uncertainty (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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