



Test Report Serial Number: **45461473 R1.0**  
 Test Report Date: **14 December 2018**  
 Project Number: **1428**

## SAR Test Report - New Certification

Applicant:



**Garmin International Inc.**  
**1200 East 151 St.**  
**Olathe, KS, 66062**  
**USA**

Maximum Reported 1g SAR			
<b>FCC</b>	BODY DTS	0.86	<b>W/kg</b>
	BODY DSS	0.01	
	BODY UNII 1	0.92	
	Sum of Simultaneous	0.93	
<b>ISED</b>	BODY DTS	0.95	
	BODY DSS	0.01	
	BODY UNII 1	0.93	
	Sum of Simultaneous	0.94	
<b>General Pop. Limit:</b>		<b>1.60</b>	

FCC ID:

**IPH-03653**

Product Model Number / HVIN

**A03653**

ISED Registration Number

**1792A-03653**

Product Name / PMN

**A03653**

In Accordance With:

**FCC 47 CFR §2.1093**

Radiofrequency Radiation Exposure Evaluation: Portable Devices

**IC RSS-102 Issue 5**

Radio Frequency Exposure Compliance of Radiocommunication Apparatus (All Frequency Bands)

Approved By:

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**Ben Hewson, President**  
 Celltech Labs Inc.  
 21-364 Lougheed Rd.  
 Kelowna, BC, V1X 7R8  
 Canada



Test Lab Certificate: 2470.01



IC Registration 3874A-1



FCC Registration: CA3874

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## 1.0 DOCUMENT CONTROL

<b>Samples Tested By:</b>	Trevor Whillock		
<b>Report Prepared By:</b>	Trevor Whillock		
<b>Report Reviewed By:</b>	Ben Hewson		
<b>Report Issue Number</b>	<b>Description</b>	<b>By</b>	<b>Report Issue Date</b>
R0.0	Draft	Trevor Whillock	13 December 2018
R1.0	Initial Release	Trevor Whillock	14 December 2018

## 2.0 CLIENT AND DEVICE INFORMATION

Client Information	
<b>Applicant Name</b>	<b>Garmin International Inc.</b>
<b>Applicant Address</b>	1200 East 151 St.
	Olathe, KS,66062
	USA
DUT Information	
<b>Device Identifier(s):</b>	<b>FCC ID:</b> <b>IPH-03653</b>
	<b>IC:</b> <b>1792A-03653</b>
<b>Type of Equipment:</b>	Digital Transmission System (DTS) FCC Part 15, RSS 247
	Spread Spectrum Transmitter (DSS) FCC Part 15
	Unlicensed National Information Infrastructure (NII) FCC Part 15
<b>Device Model(s) / HVIN:</b>	A03653
<b>Device Marketing Name / PMN:</b>	A03653
<b>Test Sample Serial No.:</b>	T/A Sample - Identical Prototype
<b>Transmit Frequency Range:</b>	WiFi: 2412 - 2462 MHz
	WiFi UNII 1: 5200 - 5240 MHz
	WiFi UNII 3: 5745-5825 MHz
	BT: 2402 - 2480 MHz
<b>Number of Channels:</b>	See Section 7.0
<b>Manuf. Max. Avg Rated Output Power:</b>	WiFi 2.4GHz: 802.11b:15.58dBm Avg. /802.11g: 15.22dBm Avg. /802.11n:15.12dBm avg.
	WiFi 5 GHz:802.11a:13.66dBm / 802.11n:13.51dBm/ 802.11ac:13.44dBm Avg.
	BT:GFSK:3.16dBm Peak/ PI/4-DQPSK: 2.53dBm Peak / 8-DPSK: 2.40dBm/
	BLE: GFSK: 3.15 dBm Peak
<b>Modulation:</b>	WiFi 802.11b/g/n: DSSS, OFDM, MCS0-7
	WiFi 802.11 a/ac: OFDM,MCS0-7
	BT: GFSK, PI/4-DQPSK, 8-DPSK
	BLE: GFSK
<b>Duty Cycle:</b>	BT-GFSK: 28%
	WIFI 2.4GHz-DSS-5.5Mbps: 77%
	WIFI 5GHz(UNII 1) OFDM-6MBps: 92%
	WIFI 5GHz(UNII 3) OFDM-54MBps: 60%
<b>DUT Power Source:</b>	5V USB, Internal Li-ion battery
<b>Deviation(s) from standard/procedure:</b>	None
<b>Modification of DUT:</b>	None

### 3.0 SCOPE OF EVALUATION

The A03653, FCC ID: IPH-A03653 ISEDC ID: 1792A-03653 is a hand held transceiver with two transmitters, one that operates in the 5GHz WiFi frequency band and the other in the 2.4GHz WiFi and Bluetooth frequency band. The transceiver is capable of simultaneous transmission between the 5GHz WiFi and Bluetooth. The device is intended for General Population Use. The product operates from an internal proprietary Li-ion rechargeable battery which can be connected to a compliant USB interface port, AC or DC adapter for charging. Test samples provided by the manufacturer were capable of transmitting at select frequencies and modulations preset by the manufacturer. An additional antenna modification was prepared for one sample allowing the ability to connect test equipment for antenna port conducted power analysis. The DUT was evaluated for SAR at the maximum conducted output power level, preset by the manufacturer and in accordance with the procedures described in IEEE 1528, IEC 62209-2, FCC KDB 865646, 447498, 248227 and RSS 102.

## 4.0 NORMATIVE REFERENCES

<b>Normative References*</b>	
ANSI / ISO 17025:2017	General Requirements for competence of testing and calibration laboratories
FCC CFR Title 47 Part 2 Title 47: Part 2.1093:	Code of Federal Regulations Telecommunication Radiofrequency Radiation Exposure Evaluation: Portable Devices
Health Canada Safety Code 6 (2015)	Limits of Human Exposure to Radiofrequency Electromagnetic Energy in the Frequency Range from 3kHz to 300GHz
Industry Canada Spectrum Management & Telecommunications Policy RSS-102 Issue 5:	Radio Frequency Exposure Compliance of Radiocommunication Apparatus (All Frequency Bands)
IEEE International Committee on Electromagnetic Safety IEEE 1528-2013:	IEEE Recommended Practice for Determining the Peak Spatial-Average Specific Absorption Rate (SAR) in the Human Head from Wireless Communications Devices: Measurement Techniques
IEC International Standard IEC 62209-2 2010	Human exposure to radio frequency fields from hand-held and body-mounted wireless communication devices - Part 2
FCC KDB KDB 865664 D01v01r04	SAR Measurement Requirements for 100MHz to 6GHz
FCC KDB KDB 447498 D01v06	Mobile and Portable Devices RF Exposure Procedures and Equipment Authorization Policies
FCC KDB KDB 248227 D01v02r02	SAR Test Guidance for IEEE 802.11 (WiFi) Transmitters
* When the issue number or issue date is omitted, the latest version is assumed.	

## 5.0 STATEMENT OF COMPLIANCE

This measurement report demonstrates that samples of the product model(s) were evaluated for Specific Absorption Rate (SAR) on the date(s) shown, in accordance with the Measurement Procedures cited and were found to comply with the Standard(s) Applied based on the Exposure Limits of the Use Group indicated for which the product is intended to be used.

<b>Applicant:</b> Garmin International Inc.	<b>Model / HVIN:</b> A03653
<b>Standard(s) Applied:</b> FCC 47 CFR §2.1093 Health Canada's Safety Code 6	<b>Measurement Procedure(s):</b> FCC KDB 865664, FCC KDB 447498, FCC KDB248227, FCC KDB 941225 Industry Canada RSS-102 Issue 5 IEEE Standard 1528-2013, IEC 62209-2
<b>Reason For Issue:</b> <input checked="" type="checkbox"/> New Certification <input type="checkbox"/> Class I Permissive Change <input type="checkbox"/> Class II Permissive Change	<b>Use Group:</b> <input checked="" type="checkbox"/> General Population / Uncontrolled <input type="checkbox"/> Occupational / Controlled
<b>Reason for Change:</b> Original Filing	<b>Limits Applied:</b> <input checked="" type="checkbox"/> 1.6W/kg - 1g Volume <input type="checkbox"/> 8.0W/kg - 1g Volume 4.0W/kg - 10g Volume
	<b>Date(s) Evaluated:</b> Nov 21, 22, Dec 4, 5 & 7, 2018

The results of this investigation are based solely on the test sample(s) provided by the applicant which was not adjusted, modified or altered in any manner whatsoever except as required to carry out specific tests or measurements. A description of the device, operating configuration, detailed summary of the test results, methodologies and procedures used during this evaluation, the equipment used and the various provisions of the rules are included in this test report.

<p>I attest that the data reported herein is true and accurate within the tolerance of the Measurement Instrument Uncertainty; that all tests and measurements were performed in accordance with accepted practices or procedures; and that all tests and measurements were performed by me or by trained personnel under my direct supervision. The results of this investigation are based solely on the test sample(s) provided by the client which were not adjusted, modified or altered in any manner whatsoever, except as required to carry out specific tests or measurements. This test report has been completed in accordance with ISO/IEC 17025.</p>	
	<p>Art Voss, P.Eng. Technical Manager Celltech Labs Inc. 14 December 2018 Date</p> 

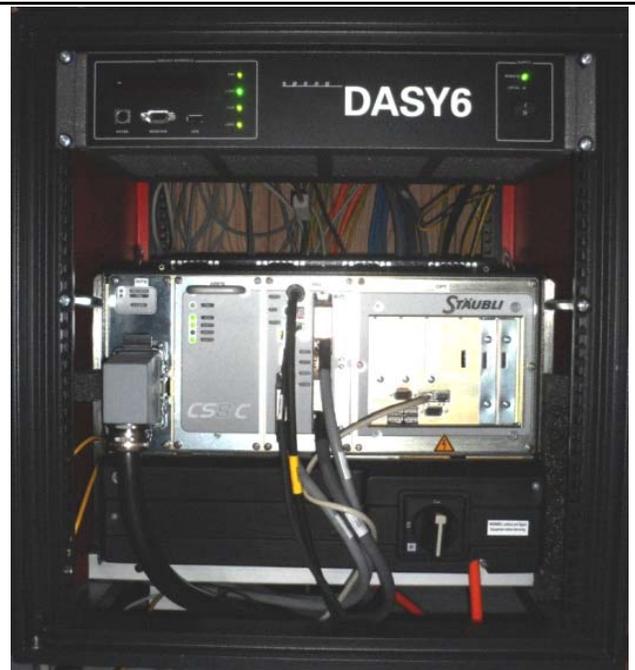
## 6.0 SAR MEASUREMENT SYSTEM

### SAR Measurement System

Celltech Labs Inc. SAR measurement facility employs a Dosimetric Assessment System (DASY™) manufactured by Schmid & Partner Engineering AG (SPEAG™) of Zurich, Switzerland. The DASY6 measurement system is comprised of the measurement server, a robot controller, a computer, a near-field probe, a probe alignment sensor, an Elliptical Planar Phantom (ELI) phantom and a specific anthropomorphic mannequin (SAM) phantom for Head and/or Body SAR evaluations. The robot is a six-axis industrial robot performing precise movements to position the probe to the location (points) of maximum electromagnetic field (EMF). A cell controller system contains the power supply, robot controller and a teach pendant (Joystick) to control the robot's servo motors. The Staubli robot is connected to the cell controller to allow software manipulation of the robot. A data acquisition electronic (DAE) circuit performs the signal amplification, signal multiplexing, AD-conversion, offset measurements, mechanical surface detection, collision detection, etc. is connected to the Electro-optical coupler (EOC). The EOC performs the conversion from the optical form the DAE to digital electronic signal and transfers data to the DASY6 measurement server. The DAE4 utilizes a highly sensitive electrometer-grade preamplifier with auto-zeroing, a channel and gain-switching multiplexer, a fast 16-bit AD-converter, a command decoder and a control logic unit. Transmission to the DASY6 measurement server is accomplished through an optical downlink for data and status information and an optical uplink for commands and clock lines. The mechanical probe-mounting device includes two different sensor systems for frontal and sidewise probe contacts. The sensor systems are also used for mechanical surface detection and probe collision detection. The robot utilizes a controller with built in VME-bus computer.



**DASY 6 SAR System with SAM Phantom**



**DASY 6 Measurement Controller**

**7.0 RF CONDUCTED POWER MEASUREMENT**

Table 7.0 Conducted Power Measurements

Conducted Power Measurements									
Channel	Frequency (MHz)	Measured Power (dBm)	Rated Power (dBm)	Rated Power (W)	Delta (dB)	SAR Test Channel (Y/N)	Mode	Modulation	Bandwidth(MHz)
1	2412	14.98	15.58	0.036	-0.60	-	WiFi 802.11(b)	DSS-1Mbps	20
2	2417	14.98	15.58	0.036	-0.60	-		DSS-1Mbps	
3	2422	15.00	15.58	0.036	-0.58	-		DSS-1Mbps	
4	2427	15.04	15.58	0.036	-0.54	-		DSS-1Mbps	
5	2432	15.08	15.58	0.036	-0.50	-		DSS-1Mbps	
6	2437	15.13	15.58	0.036	-0.45	-		DSS-1Mbps	
7	2442	15.06	15.58	0.036	-0.52	-		DSS-1Mbps	
8	2447	15.02	15.58	0.036	-0.56	-		DSS-1Mbps	
9	2452	15.09	15.58	0.036	-0.49	-		DSS-1Mbps	
10	2457	15.04	15.58	0.036	-0.54	-		DSS-1Mbps	
11	2462	15.11	15.58	0.036	-0.47	-		DSS-1Mbps	
3	2422	15.01	15.36	0.34	-0.35	-	802.11(b)	DSS-2Mbps	
		15.41	15.57	0.036	-0.16	Y		DSS-5.5Mbps	
		15.32	15.52	0.036	-0.20	-		DSS-11Mbps	
		15.00	15.22	0.033	-0.22	-	802.11(g)	OFDM-6Mbps	
		12.42	12.61	0.018	-0.19	-		OFDM-54Mbps	
		14.93	15.05	0.03	-0.12	-	802.11(n)	MCS-0	
14.95	15.12	0.033	-0.17	-	MCS-7				
6	2437	15.14	15.36	0.34	-0.22	-	802.11(b)	DSS-2Mbps	
		15.51	15.57	0.036	-0.06	Y		DSS-5.5Mbps	
		15.51	15.52	0.036	-0.01	-		DSS-11Mbps	
		15.11	15.22	0.033	-0.11	-	802.11(g)	OFDM-6Mbps	
		12.54	12.61	0.018	-0.07	-		OFDM-54Mbps	
		14.94	15.05	0.03	-0.11	-	802.11(n)	MCS-0	
15.05	15.12	0.033	-0.07	-	MCS-7				
11	2462	15.16	15.36	0.34	-0.20	-	802.11(b)	DSS-2Mbps	
		15.57	15.57	0.036	0.00	Y		DSS-5.5Mbps	
		15.50	15.52	0.036	-0.02	-		DSS-11Mbps	
		13.65	15.22	0.033	-1.57	-	802.11(g)	OFDM-6Mbps	
		12.61	12.61	0.018	0.00	-		OFDM-54Mbps	
		13.63	15.05	0.03	-1.42	-	802.11(n)	MCS-0	
14.09	15.12	0.033	-1.03	-	MCS-7				

**Table 7.1 Conducted Power Measurements**

Conducted Power Measurements									
Channel	Frequency (MHz)	Measured Power (dBm)	Rated Power (dBm)	Rated Power (W)	Delta (dB)	SAR Test Channel (Y/N)	Mode	Modulation	Bandwidth(MHz)
36	5180	13.53	13.58	0.02	-0.05	Y	WiFi 802.11(a)	OFDM-6Mbps	20
38	5190	13.26	13.58	0.02	-0.32				
40	5200	13.39	13.58	0.02	-0.19	Y			
42	5210	13.55	13.58	0.02	-0.03				
44	5220	13.28	13.58	0.02	-0.30	Y			
46	5230	13.14	13.58	0.02	-0.44				
48	5240	13.23	13.58	0.02	-0.35				
149	5745	13.50	13.58	0.02	-0.08				
151	5755	13.52	13.58	0.02	-0.06				
153	5765	13.53	13.58	0.02	-0.05				
155	5775	13.53	13.58	0.02	-0.05				
157	5785	13.54	13.58	0.02	-0.04				
159	5795	13.55	13.58	0.02	-0.03				
161	5805	13.55	13.58	0.02	-0.03				
165	5825	13.58	13.58	0.02	0.00				
36	5180	13.40	13.66	0.02	-0.26				
40	5200	13.32	13.66	0.02	-0.34				
44	5220	13.33	13.66	0.02	-0.33				
153	5765	13.58	13.66	0.02	-0.08	Y			
159	5795	13.62	13.66	0.02	-0.04	Y			
165	5825	13.66	13.66	0.02	0.00	Y			
36	5180	13.12	13.42	0.02	-0.30				
40	5200	13.25	13.42	0.02	-0.17				
44	5220	13.33	13.42	0.02	-0.09				
153	5765	13.28	13.42	0.02	-0.14				
159	5795	13.40	13.42	0.02	-0.02				
165	5825	13.42	13.42	0.02	0.00				
36	5180	12.65	13.37	0.02	-0.72				
40	5200	12.69	13.37	0.02	-0.68				
44	5220	12.49	13.37	0.02	-0.88				
153	5765	13.1	13.37	0.02	-0.27				
159	5795	13.27	13.37	0.02	-0.10				
165	5825	13.37	13.37	0.02	0.00				
40	5200	13.16	13.16	0.02	0.00				
40	5200	11.25	11.25	0.01	0.00				
159	5795	13.51	13.51	0.02	0.00				
159	5795	13.44	13.44	0.02	0.00				
40	5200	13.22	13.22	0.02	0.00				
40	5200	11.37	11.37	0.01	0.00				
40	5200	11.17	11.17	0.01	0.00				
159	5795	13.44	13.44	0.02	0.00				
159	5795	13.43	13.43	0.02	0.00				
159	5795	13.28	13.28	0.02	0.00				

**Table 7.2 Conducted Power Measurements**

Conducted Power Measurements(Peak)								
Channel	Frequency (MHz)	Measured Power (dBm)	Rated Power (dBm)	Rated Power (W)	Delta (dB)	SAR Test Channel (Y/N)	Mode	Modulation
2	2402	2.89	3.16	0.002	-0.27	Y	BT	BT-GFSK
41	2441	2.10	3.16	0.002	-1.06	-		
80	2480	1.86	3.16	0.002	-1.30	-		
2	2402	2.11	2.53	0.002	-0.42	-		PI/4 DQPSK
		2.19	2.40	0.002	-0.21	-		8-DPSK
		1.76	3.15	0.002	-1.39	-		BLE-GFSK

The rated power and tolerance are stated for typical transmission modes and data rates. Some modes and data rates may produce lower than rated conducted power levels. Power measurements taken across the various channels, modes and data rates did not produce levels in excess of the Rated Power plus Tolerance. SAR was evaluated using the power level setting specified by the manufacture to be the max output power and produce the most conservative SAR. SAR was evaluated at the maximum average tune up tolerance. See section 2.0 Client and Device Information for details. The reported SAR was not scaled down.

## 8.0 NUMBER OF TEST CHANNELS ( $N_c$ ) AND CONFIGURATIONS

This device is intended to be mounted on a vehicle dashboard; optionally, the device can be hand-held. Due to the physical dimensions of the device and the event the device may transmit within the user's apparel; the device was evaluated to BODY SAR limits. Additional preliminary evaluations were done on select edges and sides that were in close proximity to the transmitter. The back side of the device was found to be the worst case setup configuration and produced the highest SAR. Therefore the back side of the device was chosen as the primary test position. Note: Only worst case test data from the preliminary evaluation was reported. FCC KDB 941225D07V01r02 was used as guidance for the selection of test positions for SAR evaluation. Please see section 12.1 for details.

As per FCC KDB 24827, the required 802.11 test channels are Ch1, Ch6 and Ch 11; however, higher conducted output power was found on channel 3 in the lower 2.4GHz WIFI frequency band. As a result the channels selected for SAR evaluation included Ch3, Ch6, and Ch11.

When applicable, SAR test reduction methods may be utilized.

802.11b DSSS SAR test reduction is determined according to the following:

- When the reported SAR of the highest measured maximum output power channel is  $\leq$  to 0.8 W/kg, no further SAR testing is required for 802.11b DSSS in that exposure configuration.
- When the reported SAR is  $>$  0.8 W/kg, SAR is required for that exposure configuration using the next highest output power channel. When any reported SAR is  $>$  1.2 W/Kg, SAR is required for the third channel.

2.4 GHz 802.11g/n OFDM SAR Test Exclusion Requirements

- When KDB Publication 447498 SAR test exclusion applies to the OFDM configuration.
- When the highest reported SAR for DSSS is adjusted by the ratio of OFDM to DSSS specified maximum output power and the adjusted SAR is  $\leq$  1.2 W/kg.

See 12.1 for details.

The initial test configuration for 2.4 GHz and 5 GHz OFDM transmission modes is determined by the 802.11 configuration with the highest maximum output power specified for production units, including tune-up tolerance, in each standalone and aggregated frequency band. An initial test position was established for Both UNII1 and UNII 3 bands.

When the reported SAR of the initial test configuration is  $>$  0.8 W/kg, SAR measurement is required for subsequent next highest measured output power channel(s) in the initial test configuration until reported SAR is  $\leq$  1.2 W/kg or all required channels are tested.

NOTE: The Bluetooth transmitter is capable of simultaneous transmission with the 5GHz WiFi Transmitter.

Due to the nature of this device, Bluetooth was also evaluated for Simultaneous Transmission SAR. Conducted power measurements were taken across the various channels, modes and data rates. The Bluetooth test channel with the highest measured maximum output power was selected for evaluation in combination with the worst case 5GHz WiFi test configuration with the highest measured SAR.

## 9.0 SAR MEASUREMENT SUMMARY

**Table 9.0: Measured Results**

Measured SAR Results (1g) - BODY(FCC/ISED)															
Date	Plot ID #	DUT Model	Test Type	Test Freq. (MHz)	Modulation	Accessories				DUT Spacing		Meas. Cond. Power (dBm)	Measured SAR 10g (W/kg)	SAR Drift (dB)	
						Antenna ID	Battery ID	Body ID	Audio ID	DUT (mm)	Antenna (mm)				
<b>BODY SAR WiFi 2.4 GHz</b>															
21 Nov 2018	B1	A03653	BODY-Back	2422	DSS-5.5Mbps	n/a	n/a	n/a	n/a	0	0	15.41	0.793	-0.430	
21 Nov 2018	B2	A03653	BODY-Back	2437	DSS-5.5Mbps	n/a	n/a	n/a	n/a	0	0	15.51	0.750	-0.590	
21 Nov 2018	B3	A03653	BODY-Back	2462	DSS-5.5Mbps	n/a	n/a	n/a	n/a	0	0	15.57	0.712	0.190	
22 Nov 2018	B4	A03653	BODY-Front	2422	DSS-5.5Mbps	n/a	n/a	n/a	n/a	0	0	15.41	0.052	999.000	
22 Nov 2018	B5	A03653	BODY-Top	2422	DSS-5.5Mbps	n/a	n/a	n/a	n/a	0	0	15.41	0.302	-0.780	
22 Nov 2018	B6	A03653	BODY-Back	2402	BT-GFSK	n/a	n/a	n/a	n/a	0	0	2.89	0.007	-0.110	
<b>WiFi 802.11(a) 5 GHz UNII-1</b>															
04 Dec 2018	B7	A03653	BODY Back Side	5180	802.11a OFDM-6Mbps	n/a	n/a	n/a	n/a	0	0	13.53	0.890	-0.050	
04 Dec 2018	B8	A03653	BODY Back Side	5200	802.11a OFDM-6Mbps	n/a	n/a	n/a	n/a	0	0	13.39	0.873	0.030	
05 Dec 2018	B9	A03653	BODY Back Side	5220	802.11a OFDM-6Mbps	n/a	n/a	n/a	n/a	0	0	13.28	0.866	0.610	
<b>WiFi 802.11(a) 5 GHz UNII-3</b>															
07 Dec 2018	B10	A03653	BODY Back Side	5765	OFDM-54Mbps	n/a	n/a	n/a	n/a	0	0	13.58	0.643	1.340	
07 Dec 2018	B11	A03653	BODY Back Side	5795	OFDM-54Mbps	n/a	n/a	n/a	n/a	0	0	13.62	0.802	-0.330	
07 Dec 2018	B12	A03653	BODY Back Side	5825	OFDM-54Mbps	n/a	n/a	n/a	n/a	0	0	13.66	0.757	-0.220	
<b>FCC 47 CFR 2.1093</b>					<b>Health Canada Safety Code 6</b>					<b>BODY</b>	<b>1g Average</b>	<b>1.6 W/kg</b>	<b>General Population</b>		

\*Worst case preliminary edge test. Reference Section 8.0 for details

## 10.0 SCALING OF MAXIMUM MEASURED SAR

**Table 10.0 SAR Scaling**

Scaling of Maximum Measured SAR <sup>(1)</sup>							
Plot ID	Configuration	Freq	Measured Fluid Deviation		Measured Conducted Power	Measured Drift	Measured SAR (1g)
		(MHz)	Permittivity	Conductivity	(dBm)	(dB)	(W/kg)
B1	BODY-Back Side	2422	0.71%	6.45%	15.4	-0.430	0.793
B6*	BODY- Back Side	2402	0.85%	4.84%	2.9	-0.110	0.007
B7	BODY- Back Side	5180	-6.36%	6.82%	13.5	-0.050	0.890
Step 1							
Fluid Sensitivity Adjustment							
Plot ID	Scale Factor		Measured SAR			Step 1 Adjusted SAR (1g)	
	(%)	X	(W/kg)		=	(W/kg)	
B1	2.980%	X	0.793		=	0.817	
B6*	n/a	X	0.007		=	0.007	
B7	1.12%	X	0.890		=	0.900	
Step 2							
Manufacturer's Tune-Up Tolerance							
Plot ID	Measured Conducted Power	Rated Power	Delta		Step 1 Adjusted SAR		Step 2 Adjusted SAR (1g)
	(dBm)	(dBm)	(dB)	+	(W/kg)	=	(W/kg)
B1	15.4	15.6	-0.2	+	0.817	=	0.856
B6*	2.9	3.2	-0.3		0.007	=	0.008
B7	13.5	13.7	-0.1		0.900	=	0.921
Step 3 (ISED)							
Drift Adjustment							
Plot ID	Measured Drift		Step 2 Adjusted SAR			Step 3 Adjusted SAR (1g)	
	(dB)	+	(W/kg)		=	(W/kg)	
B1	-0.430	+	0.856		=	0.945	
B6*	-0.110	+	0.008		=	0.008	
B7	-0.050	+	0.921		=	0.932	
Step 4							
Reported SAR							
Plot ID	FCC			ISED			
	From Steps 1 and 2			From Steps 1 through 3			
	1g SAR (W/kg)			1g SAR (W/kg)			
B1	0.856			0.945			
B6*	0.008			0.008			
B7	0.921			0.932			

\*Measured SAR Value

Note: The device is only capable of simultaneous transmission between the Bluetooth Transmitter and the 5 GHz WiFi Transmitter. The 2.4GHz WiFi Transmitter and the Bluetooth Transmitter share the same antenna; therefore, they cannot simultaneously transmit. From Table 10.0 Step 4, the standalone Max SAR values for 2.4GHz Bluetooth and 5 GHz WiFi were used to calculate the simultaneous SAR below.

As Per FCC KDB 690783:

**FCC Simultaneous SAR:**

The sum of the simultaneous was calculated as follows.

Plot(B1)DSS=0.008 W/kg  
Plot(B7)UNII 1=0.921W/kg

Sum of Simultaneous= DSS SAR + UNII 1 SAR

Sum of Simultaneous =0.008W/kg + 0.921W/kg= **0.929 W/kg**

**ISED Simultaneous SAR:**

The sum of the simultaneous was calculated as follows.

Plot(B1)DSS=0.008 W/kg  
Plot(B7)UNII 1=0.932W/kg

Sum of Simultaneous= DSS SAR + UNII 1 SAR

Sum of Simultaneous =0.008W/kg + 0.932W/kg= **0.940 W/kg**

Stand alone SAR test exclusion of the Bluetooth transmitter is evaluated using Max Power = 4dBm (2.52mW), Separation Distance = 5mm, Transmit Frequency = 2.402GHz.

Per KDB 447498 D01v06 [4.3.1(a)], SAR Test Exclusion is given by:

$$[(\text{Max Power, mW}) / (\text{Separation Distance, mm})] * [\sqrt{f, \text{GHz}}] \leq 7.5 \text{ for } 10\text{g SAR}$$
$$[(2.52)/(5)] * [\sqrt{2.402}] = 0.774 \leq 7.5$$

Therefore the Bluetooth transmitter meets the SAR Test Exclusion criteria.

Note: Due to the simultaneous capabilities Bluetooth SAR was still measured at the highest output channel and modulation in substitution of estimated SAR, as per the steps above.

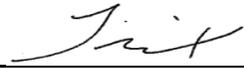
NOTES to Table 10.0	
<p>(1) Scaling of the Maximum Measured SAR is based on the highest, 100% duty cycle, Face, Body and/or Head SAR measured of ALL test channels, configurations and accessories used during THIS evaluation. The Measured Fluid Deviation parameters apply only to deviation of the tissue equivalent fluids used at the frequencies which produced the highest measured SAR. The Measured Conducted Power applies to the Conducted Power measured at the frequencies producing the highest Face and Body SAR. The Measured Drift is the SAR drift associated with that specific SAR measurement. The Reported SAR is the accumulation of all SAR Adjustments from the applicable Steps 1 through 5. The Plot ID is for identification of the SAR Measurement Plots in Annex A of this report.</p> <p>NOTE: Some of the scaling factors in Steps 1 through 5 may not apply and are identified by light gray text.</p>	
<b>Step 1</b>	<p>Per IEC-62209-1 and FCC KDB 865664. Scaling required only when Measured Fluid Deviation is greater than 5%. If the Measured Fluid Deviation is greater than 5%, Table 11.1 will be shown and will indicate the SAR scaling factor in percent (%). SAR is MULTIPLIED by this scaling factor only when the scaling factor is positive (+).</p>
<b>Step 2</b>	<p>Per KDB 447498. Scaling required only when the difference (Delta) between the Measured Conducted Power and the Manufacturer's Rated Conducted Power is (-) Negative. The absolute value of Delta is ADDED to the SAR.</p>
<b>Step 3</b>	<p>Per IEC 62209-1. Scaling required only when Measured Drift is (-) Negative. The absolute value of Measured Drift is added to Reported or Simultaneous Reported SAR.</p>
<b>Step 4</b>	<p>The Reported SAR is the Maximum Final Adjusted Cumulative SAR from the applicable Steps 1 through 5 are reported on Page 1 of this report.</p>

**Table 10.2 Fluid Sensitivity Calculation (1g)**

Fluid Sensitivity Calculation (1g)	
Delta SAR = Ce * Delta Er + C(sigma)*Delta Sigma	
Frequency (GHz)	Plot ID
2.422	B1
Ce	-0.2250
Cσ	0.4863
Δ E	0.71%
Δσ	6.45%
<b>ΔSAR</b>	2.98%
<b>Scale Factor Is Positive. Scaling Required</b>	

**Table 10.3 Fluid Sensitivity Calculation (1g)**

<b>Fluid Sensitivity Calculation (1g)</b>	
<b>Delta SAR = Ce * Delta Er + C(sigma)*Delta Sigma</b>	
<b>Frequency (GHz)</b>	<b>Plot ID</b>
<b>5.180</b>	<b>B7</b>
Ce	-0.2015
Cσ	-0.0240
Δ E	-6.36%
Δσ	6.82%
<b>ΔSAR</b>	<b>1.12%</b>
<b>Scale Factor Is Positive. Scaling Required</b>	

<p>I attest that the data reported herein is true and accurate within the tolerance of the Measurement Instrument Uncertainty; that all tests and measurements were performed in accordance with accepted practices or procedures; and that all tests and measurements were performed by me or by trained personnel under my direct supervision. The results of this investigation are based solely on the test sample(s) provided by the client which were not adjusted, modified or altered in any manner whatsoever, except as required to carry out specific tests or measurements. This test report has been completed in accordance with ISO/IEC 17025.</p>	 <p>Trevor Whillock Test Lab Engineer Celltech Labs Inc. 14 December 2018 Date</p>
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## 11.0 SAR EXPOSURE LIMITS

Table 11.0 Exposure Limits

SAR RF EXPOSURE LIMITS			
FCC 47 CFR§2.1093	Health Canada Safety Code 6	General Population / Uncontrolled Exposure <sup>(4)</sup>	Occupational / Controlled Exposure <sup>(5)</sup>
Spatial Average <sup>(1)</sup> (averaged over the whole body)		0.08 W/kg	0.4 W/kg
Spatial Peak <sup>(2)</sup> (Head and Trunk averaged over any 1 g of tissue)		1.6 W/kg	8.0 W/kg
Spatial Peak <sup>(3)</sup> (Hands/Wrists/Feet/Ankles averaged over 10 g)		4.0 W/kg	20.0 W/kg
(1) The Spatial Average value of the SAR averaged over the whole body.			
(2) 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.			
(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.			
(4) Uncontrolled environments are defined as locations where there is potential exposure to individuals who have no knowledge or control of their potential exposure.			
(5) Controlled environments are defined as locations where there is potential exposure to individuals who have knowledge of their potential exposure and can exercise control over their exposure.			

## 12.0 DETAILS OF SAR EVALUATION

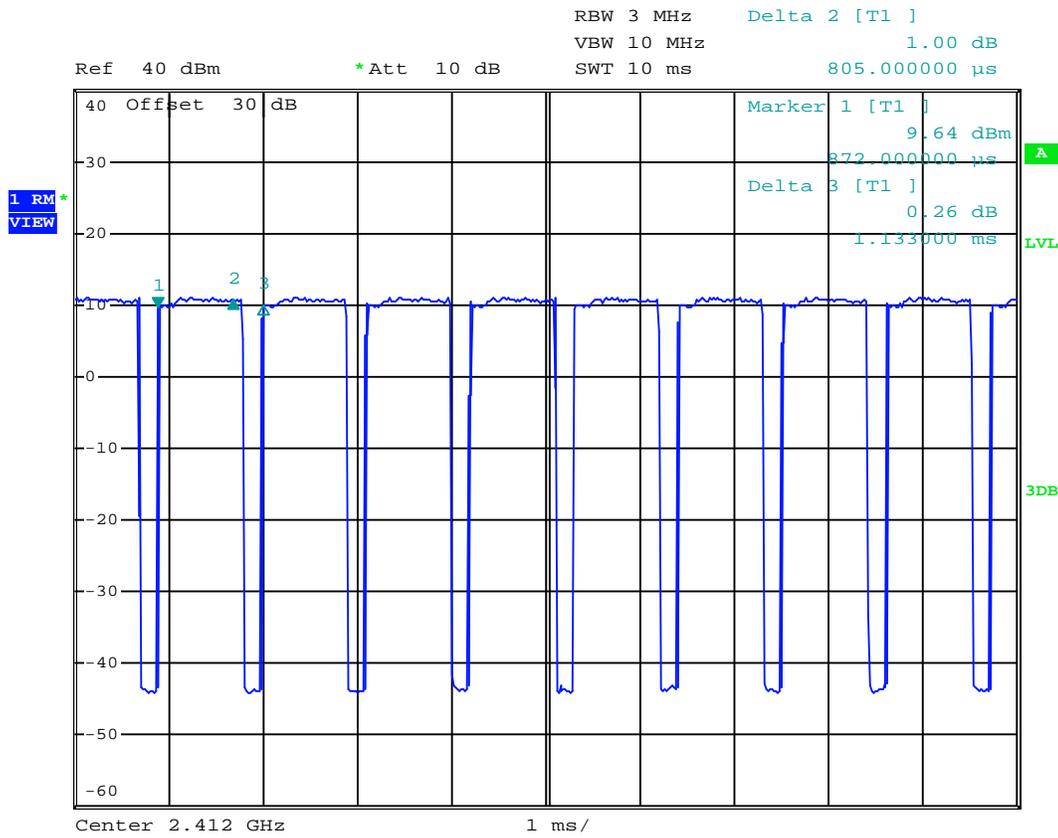
### 12.0 Day Log

DAY LOG					Fluid Dielectric	SPC	Test
Date	Ambient Temp °C	Fluid Temp °C	Humidity	TSL			
21 Nov 2018	23	22.9	28%	2450B	X	X	X
22 Nov 2018	22	22.1	28%	2450B			X
03 Dec 2018	23	22.8	28%	5250B	X	X	
04 Dec 2018	22	22.1	26%	5250B			X
05 Dec 2018	23	22.5	25%	5250B			X
07 Dec 2018	24	22.5	28%	5750B	X	X	X

## 12.1 DUT Setup and Configuration

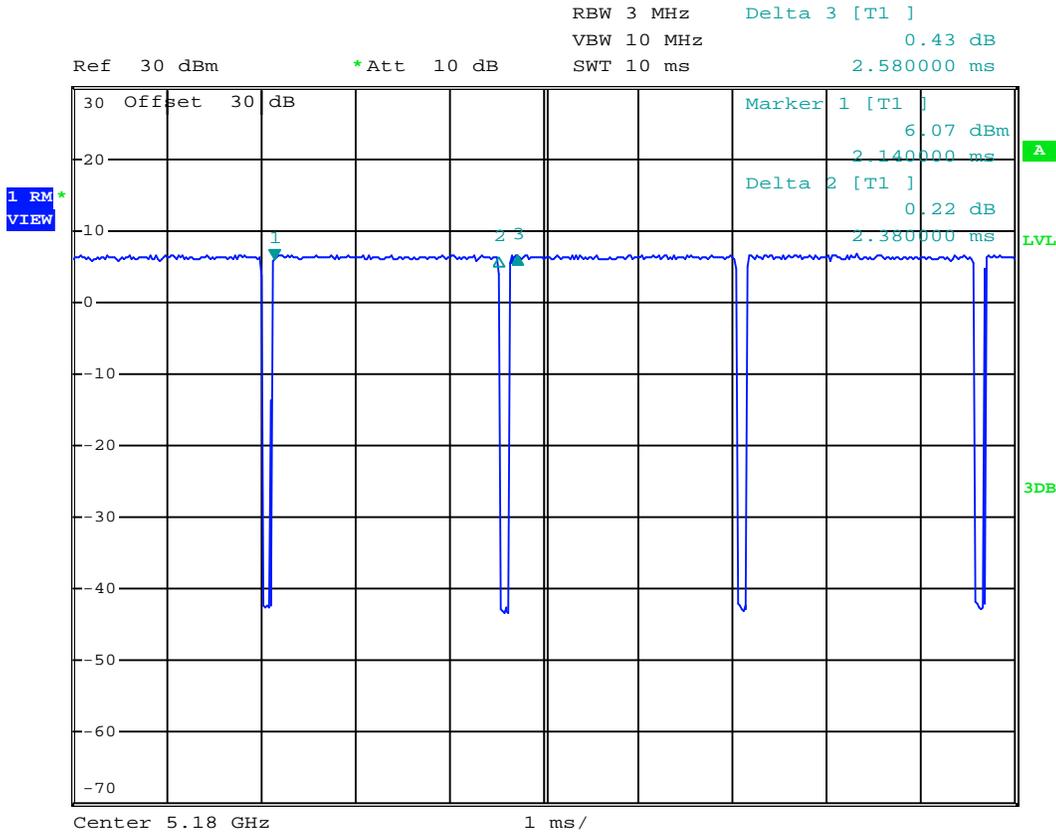
DUT Setup and Configuration	
1	<p>The DUT was evaluated for SAR in accordance with the procedures described in IEEE 1528, FCC KDB 865646, 447498, 941225, 248227, and RSS-102.</p> <p>The device was evaluated at a phantom separation distance of 0mm.</p>
2	<p>The intended use of the device is to be hand held or mounted. The DUT was additionally evaluated for SAR in accordance with the procedures described in KDB 941225D07V01r02.</p> <p>Since the overall diagonal dimension of the display is &gt; than 20cm no additional sides or edges of the device were required for SAR evaluation; however, worst case test positions(Back Side, Front Side and Top Side) which were leverage from the EU evaluation were also spot checked in BODY TSL.Reference Appendix D, Figures D5, D6&amp; D7.</p> <p>Due to the overall dimensions of the device and the event the device may transmit within the user's apparel. The device was tested to Body Limits.</p>
3	<p>5GHz Initial Test Position SAR Test Reduction Procedure As per KDB 248227D01</p> <p>When the reported SAR of the initial test position is <math>\leq 0.4</math> W/kg, further SAR measurement is not required for the other (remaining) test positions in that exposure configuration .</p>
4	<p>2.4GHz 802.11g/n OFDM SAR Test Exclusion</p> <p>As Per KDB 248227 D01v02r02 - 5.2.2,</p> <p>b) When the highest reported SAR for DSSS is adjusted by the ratio of OFDM to DSSS specified maximum output power and the adjusted SAR is <math>\leq 1.2</math> W/kg.</p> <p>Maximum 802.11g/n OFDM specified power(POFDM)= 15.22dBm            Maximum 802.11b DSSS specified power (PDSSS)= 15.58dBm            Ratio OFDM/DSSS power =-0.36dBm(92%)            Highest reported* SAR (SARMAX)= 0.817 W/kg</p>
5	<p>The Device was capable of transmitting at various modulations and data rates. The Conducted Power was higher when measured in DSS Mode-5.5Mbps for 2.4GHz ,OFDM Mode-6Mbps for UNII-1 and OFDM Mode-54 Mbps for UNII-3 than any other configuration. The DUT was evaluated for SAR at the maximum conducted output power level, preset by the manufacturer.</p> <p>Each SAR evaluation was performed with a fully charged battery.</p>

## 12.2 Duty Cycle Evaluation



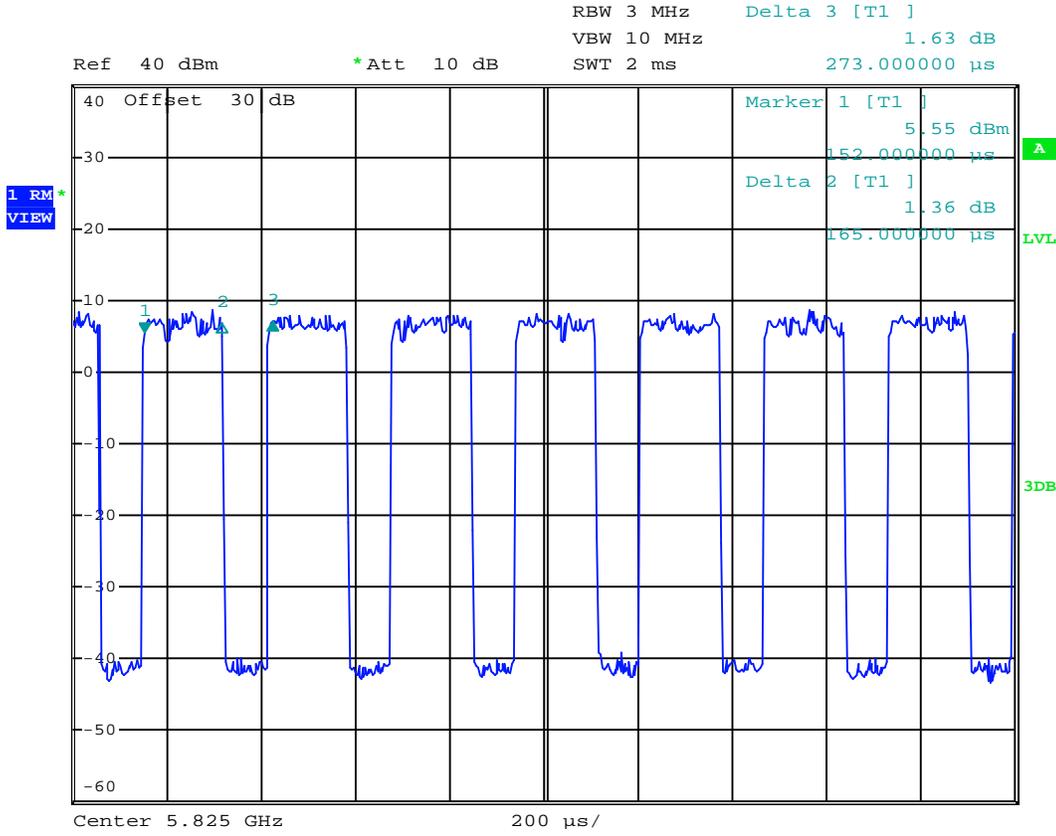
Date: 6.DEC.2018 13:55:13

DSSS at 5.5Mbps was found to be the worst case test mode for 2.4GHZ WiFi. The transmit Duty cycle was 77% as indicated in the above plot. This duty cycle cannot be altered by the user. A measurement Crest factor of 1.30 was used by the SAR measurement server. The measured SAR in Table 10.0 is the post-processed SAR adjusted by the Crest Factor.



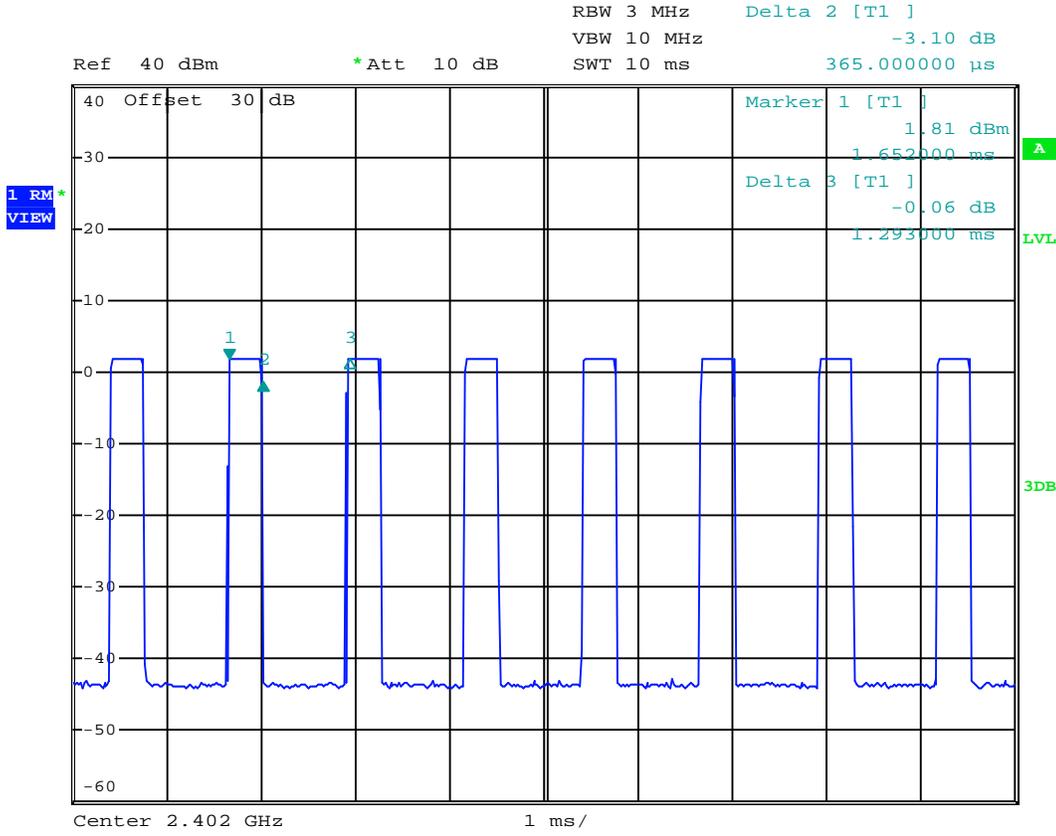
Date: 11.DEC.2018 12:36:21

OFDM at 6Mbps was found to be the worst case test mode for 5GHZ UNII 1 WiFi. The transmit Duty cycle was 92% as indicated in the above plot. This duty cycle cannot be altered by the user. A measurement Crest factor of 1.09 was used by the SAR measurement server. The measured SAR in Table 10.0 is the post-processed SAR adjusted by the Crest Factor.



Date: 6.DEC.2018 13:05:35

OFDM at 54Mbps was found to be the worst case test mode for 5GHZ UNII 3 WiFi. The transmit Duty cycle was 60% as indicated in the above plot. This duty cycle cannot be altered by the user. A measurement Crest factor of 1.67 was used by the SAR measurement server. The measured SAR in Table 10.0 is the post-processed SAR adjusted by the Crest Factor.



Date: 6.DEC.2018 14:02:17

GFSK was found to be the worst case test mode for Bluetooth. The transmit Duty cycle was 28% as indicated in the above plot. This duty cycle cannot be altered by the user. A measurement Crest factor of 3.57 was used by the SAR measurement server. The measured SAR in Table 10.0 is the post-processed SAR adjusted by the Crest Factor.

### 12.3 DUT Positioning

<b>DUT Positioning</b>	
<b>Positioning</b>	The DUT Positioner was securely fastened to the Phantom Platform. Registration marks were placed on the DUT and the Positioner to ensure consistent positioning of the DUT for each test evaluation.
<b>FACE Configuration</b>	This device is not intended to be held to the face and was not tested in the FACE configuration.
<b>BODY Configuration</b>	The DUT was securely clamped into the device holder with the surface of the DUT normally in contact with the body in direct contact with the bottom of the phantom, or 0mm separation from the DUT's accessory to the phantom.
<b>HEAD Configuration</b>	This device is not intended to be held to the ear and was not tested in the HEAD configuration.

## 12.4 General Procedures and Report

<b>General Procedures and Reporting</b>	
<b>General Procedures</b>	<p>The fluid dielectric parameters of the Active Tissue Simulating Liquid (TSL) were measured as described in this Section, recorded and entered into the DASY Measurement Server. Active meaning the TSL used during the SAR evaluation of the DUT. The temperature of the Active TSL was measured and recorded prior to performing a System Performance Check (SPC). An SPC was performed with the Active TSL prior to the start of the test series. The temperature of the Active TSL was measured throughout the day and the Active TSL temperature was maintained to <math>\pm 0.5^{\circ}\text{C}</math>. The Active TSL temperature was maintained to within <math>\pm 2.0^{\circ}\text{C}</math> throughout the test series. The liquid parameters shall be measured within 24 hours before the start of a test series and if it takes longer than 48 hours, the liquid parameters shall also be measured at the end of the test series.</p> <p>An Area Scan exceeding the length and width of the DUT projection was performed and the locations of all maximas within 2dB of the Peak SAR recorded. A Zoom Scan centered over the Peak SAR location(s) was performed and the 1g and 10g SAR values recorded. The resolutions of the Area Scan and Zoom Scan are described in the Scan Resolution table(s) in this Section. A Power Reference Measurement was taken at the phantom reference point immediately prior to the Area Scan. A Power Drift measurement was taken at the phantom reference point immediately following the Zoom Scan to determine the power drift. A Z-Scan from the <i>Maximum Distance to Phantom Surface</i> to the fluid surface was performed following the power drift measurement.</p>
<b>Reporting</b>	<p>The 1g SAR, 10g SAR and power drift measurements are recorded in the SAR Measurement Summary tables in the SAR Measurement Summary Section of this report. The SAR values shown in the 100% DC (Duty Cycle) column are the SAR values reported by the SAR Measurement Server with the DUT operating at 100% transmit duty cycle. These tables also include other information such as transmit channel and frequency, modulation, accessories tested and DUT-phantom separation distance.</p> <p>In the Scaling of Maximum Measured SAR Section of this report, the highest measured SAR in the BODY configuration, within the entire scope of this assessment, are, when applicable, scaled for Fluid Sensitivity, Manufacturer's Tune-Up Tolerance, Simultaneous Transmission and Drift. With the exception of Duty Cycle correction/compensation, SAR values are <u>ONLY</u> scaled up, not down. The final results of this scaling is the <u>reported SAR</u> which appears on the Cover Page of this report.</p>

## 12.5 Fluid Dielectric and Systems Performance Check

Fluid Dielectric and Systems Performance Check	
<b>Fluid Dielectric Measurement Procedure</b>	<p>The fluid dielectric parameters of the Tissue Simulating Liquid (TSL) are measured using the Open-Ended Coax Method connected to an Agilent 8753ET Network Analyzer connected to a measurement server running April Dielectric Property Measurement System. A frequency range of <math>\pm 100\text{MHz}</math> for frequencies <math>&gt; 300\text{MHz}</math> and <math>\pm 50\text{MHz}</math> for frequencies <math>\leq 300\text{MHz}</math> with frequency step size of <math>10\text{MHz}</math> is used. The center frequency is centered around the SAR measurement probe's calibration point for that TSL frequency range. A calibration of the setup is performed using a short-open-deionized water (at <math>23^\circ\text{C}</math> in a 300ml beaker) method. A sample of the TSL is placed in a 300ml beaker and the open-ended coax is submerged approximately 8mm below the fluid surface in the approximate center of the beaker. A check of the setup is made to ensure no air is trapped under the open-ended coax. The sample of TSL is measured and compared to the FCC KDB 865664 targets for HEAD or BODY for the entire fluid measurement range. Fluid adjustment are made if the dielectric parameters are <math>&gt; 5\%</math> in range that the DUT is to be tested. If the adjustments fail to bring the parameters to <math>\leq 5\%</math> but are <math>&lt; 10\%</math>, the SAR Fluid Sensitivity as per IEC 62201-1 and FCC KDB 865664 are applied to the highest measured SAR. A TSL with dielectric parameters <math>&gt; 10\%</math> in the DUT test frequency range are not used.</p>
<b>Systems Performance Check</b>	<p>The fluid dielectric parameters of the Active TSL are entered into the DASY Measurement Server at each of the <math>10\text{MHz}</math> step size intervals. Active meaning the TSL used during the SAR evaluation of the DUT. The DASY Measurement System will automatically interpolate the dielectric parameters for DUT test frequencies that fall between the <math>10\text{MHz}</math> step intervals.</p> <p>A Systems Performance Check (SPC) is performed in accordance with IEEE 1528 "System Check" and FCC KDB 865664 "System Verification". A validation source, dipole or Confined Loop Antenna (CLA), is placed under the geometric center of the phantom and separated from the phantom in accordance to the validation source's Calibration Certificate data. A CW signal set to the frequency of the validate source's and SAR measurement probe's calibration frequency with a forward power set to the validation source's Calibration Certificate data power setting is applied to the validation source. An Area Scan is centered over the projection of the validation source's feed point and an Area Scan is taken. A Zoom Scan centered over the Peak SAR measurement of the Area Scan and the 1g and 10g SAR is measured. The measured 1g and 10g SAR is compared to the 1g and 10g SAR measurements from the validation source's Calibration Certificate. When required, the measured SAR is normalized to 1.0W and compared to the normalized SAR indicated on the validation source's Calibration Certificate. The SPC is considered valid when the measured and normalized SAR is <math>\leq 10\%</math> of the measured and normalize SAR of the validation source's Calibration Certificate.</p> <p>The fluid dielectric parameters of the Active TSL and SPC are repeated when the Active TSL has been in use for greater than 84 hours or if the Active TSL temperature has exceed <math>\pm 1^\circ\text{C}</math> of the initial fluid analysis.</p>

## 12.6 Scan Resolution 100MHz to 2GHz

Scan Resolution 100MHz to 2GHz	
Maximum distance from the closest measurement point to phantom surface: (Geometric Center of Probe Center)	<b><math>4 \pm 1 \text{ mm}</math></b>
Maximum probe angle normal to phantom surface. (Flat Section ELI Phantom)	<b><math>5^\circ \pm 1^\circ</math></b>
Area Scan Spatial Resolution $\Delta X, \Delta Y$	<b>15 mm</b>
Zoom Scan Spatial Resolution $\Delta X, \Delta Y$	<b>7.5 mm</b>
Zoom Scan Spatial Resolution $\Delta Z$ (Uniform Grid)	<b>5 mm</b>
Zoom Scan Volume X, Y, Z	<b>30 mm</b>
Phantom	<b>ELI</b>
Fluid Depth	<b><math>150 \pm 5 \text{ mm}</math></b>
An Area Scan with an area extending beyond the device was used to locate the candidate maximas within 2dB of the global maxima.	
A Zoom Scan centered over the peak SAR location(s) determined by the Area Scan was used to determine the 1-gram and 10-gram peak spatial-average SAR	

## 12.7 Scan Resolution 2GHz to 3GHz

Scan Resolution 2GHz to 3GHz	
Maximum distance from the closest measurement point to phantom surface: (Geometric Center of Probe Center)	4 ± 1 mm
Maximum probe angle normal to phantom surface. (Flat Section ELI Phantom)	5° ± 1°
Area Scan Spatial Resolution ΔX, ΔY	12 mm
Zoom Scan Spatial Resolution ΔX, ΔY	5 mm
Zoom Scan Spatial Resolution ΔZ (Uniform Grid)	5 mm
Zoom Scan Volume X, Y, Z	30 mm
Phantom	ELI
Fluid Depth	150 ± 5 mm
An Area Scan with an area extending beyond the device was used to locate the candidate maximas within 2dB of the global maxima.	
A Zoom Scan centered over the peak SAR location(s) determined by the Area Scan was used to determine the 1-gram and 10-gram peak spatial-average SAR	

## 12.8 Scan Resolution 5GHz to 6GHz

Scan Resolution 5GHz to 6GHz	
Maximum distance from the closest measurement point to phantom surface: (Geometric Center of Probe Center)	4 ± 1 mm
Maximum probe angle normal to phantom surface. (Flat Section ELI Phantom)	5° ± 1°
Area Scan Spatial Resolution ΔX, ΔY	10 mm
Zoom Scan Spatial Resolution ΔX, ΔY	4 mm
Zoom Scan Spatial Resolution ΔZ (Uniform Grid)	2 mm
Zoom Scan Volume X, Y, Z	22 mm
Phantom	ELI
Fluid Depth	100 ± 5 mm
An Area Scan with an area extending beyond the device was used to locate the candidate maximas within 2dB of the global maxima.	
A Zoom Scan centered over the peak SAR location(s) determined by the Area Scan was used to determine the 1-gram and 10-gram peak spatial-average SAR	

### 13.0 MEASUREMENT UNCERTAINTIES

Table 13.0 Measurement Uncertainty

UNCERTAINTY BUDGET FOR DEVICE EVALUATION (IEEE 1528-2013 Table 9)									
Source of Uncertainty	IEEE 1528 Section	Toler ±%	Prob Dist	Div	c <sub>i</sub>	c <sub>i</sub>	Stand Unct ±%	Stand Unct ±%	V <sub>i</sub> or V <sub>eff</sub>
					(1g)	(10g)	(1g)	(10g)	
<b>Measurement System</b>									
EX3DV4 Probe Calibration** (k=1)	E.2.1	6.7	N	1	1	1	6.7	6.7	∞
Axial Isotropy** (k=1)	E.2.2	0.6	R	√3	0.7	0.7	0.2	0.2	∞
Hemispherical Isotropy** (k=1)	E.2.2	3.2	R	√3	0.7	0.7	1.3	1.3	∞
Boundary Effect*	E.2.3	1.0	R	√3	1	1	0.6	0.6	∞
Linearity** (k=1)	E.2.4	0.5	R	√3	1	1	0.3	0.3	∞
System Detection Limits*	E.2.4	1.0	R	√3	1	1	0.6	0.6	∞
Modulation Response** (k=1)	E.2.5	8.3	R	√3	1	1	4.8	4.8	∞
Readout Electronics*	E.2.6	0.3	N	1	1	1	0.3	0.3	∞
Response Time*	E.2.7	0.8	R	√3	1	1	0.5	0.5	∞
Integration Time*	E.2.8	2.6	R	√3	1	1	1.5	1.5	∞
RF Ambient Conditions - Noise	E.6.1	0.0	R	√3	1	1	0.0	0.0	10
RF Ambient Conditions - Reflection	E.6.1	0.0	R	√3	1	1	0.0	0.0	10
Probe Positioner Mechanical Tolerance*	E.6.2	0.0	R	√3	1	1	0.0	0.0	∞
Probe Positioning wrt Phantom Shell*	E.6.3	0.4	R	√3	1	1	0.2	0.2	∞
Post-processing*	E.5	2.0	R	√3	1	1	1.2	1.2	∞
<b>Test Sample Related</b>									
Test Sample Positioning	E.4.2	2.2	N	1	1	1	2.2	2.2	5
Device Holder Uncertainty*	E.4.1	3.6	N	1	1	1	3.6	3.6	∞
SAR Drift Measurement <sup>(2)</sup>	E.2.9	0.0	R	√3	1	1	0.0	0.0	∞
SAR Power Scaling <sup>(3)</sup>	E.6.5	0.0	R	√3	1	1	0.0	0.0	∞
<b>Phantom and Tissue Parameters</b>									
Phantom Uncertainty*	E.3.1	6.1	R	√3	1	1	3.5	3.5	∞
SAR Correction Uncertainty	E.3.2	1.6	N	1	1	0.84	1.6	1.3	∞
Liquid Conductivity (measurement)	E.3.3	5.0	N	1	0.78	0.71	3.9	3.6	10
Liquid Permittivity (measurement)	E.3.3	5.0	N	1	0.23	0.26	1.2	1.3	10
Liquid Conductivity (Temperature)	E.3.2	0.4	R	√3	0.78	0.71	0.2	0.2	10
Liquid Permittivity Temperature)	E.3.2	0.2	R	√3	0.23	0.26	0.0	0.0	10
<b>Effective Degrees of Freedom<sup>(1)</sup></b>									<b>V<sub>eff</sub> = 1141</b>
<b>Combined Standard Uncertainty</b>			<b>RSS</b>				<b>11.1</b>	<b>11.0</b>	
<b>Expanded Uncertainty (95% Confidence Interval)</b>			<b>k=2</b>				<b>22.2</b>	<b>21.9</b>	
<b>Measurement Uncertainty Table in accordance with IEEE Standard 1528-2003</b>									

(1) The Effective Degrees of Freedom is > 30

Therefore a coverage factor of k=2 represents an approximate confidence level of 95%.

(2) The SAR Value is compensated for Drift

(3) SAR Power Scaling not Required

\* Provided by SPEAG for DASY4

**Table 13.1 Calculation of Degrees of Freedom**

Calculation of the Degrees and Effective Degrees of Freedom	
$v_i = n - 1$	$v_{\text{eff}} = \frac{u_c^4}{m \sum_{i=1} \frac{c_i^4 u_i^4}{v_i}}$

## 14.0 FLUID DIELECTRIC PARAMETERS

**Table 14.0 Fluid Dielectric Parameters 2450MHz BODY TSL**

```

*****
                Aprel Laboratory
                Test Result for UIM Dielectric Parameter
                Wed 21/Nov/2018 10:38:42
                Freq   Frequency(GHz)
                FCC_eH FCC Bulletin 65 Supplement C ( June 2001) Limits for Head Epsilon
                FCC_sH FCC Bulletin 65 Supplement C (June 2001) Limits for Head Sigma
                FCC_eB FCC Limits for Body Epsilon
                FCC_sB FCC Limits for Body Sigma
                Test_e Epsilon of UIM
                Test_s Sigma of UIM
*****

```

Freq	FCC_eB	FCC_sB	Test_e	Test_s
2.3500	52.83	1.85	53.31	1.92
2.3600	52.82	1.86	53.27	1.94
2.3700	52.81	1.87	53.23	1.94
2.3800	52.79	1.88	53.18	1.96
2.3900	52.78	1.89	53.15	1.96
2.4000	52.77	1.90	53.24	1.99
2.4100	52.75	1.91	53.11	2.01
2.4200	52.74	1.92	53.12	2.05
2.4300	52.73	1.93	53.09	2.03
2.4400	52.71	1.94	53.11	2.05
2.4500	52.70	1.95	52.93	2.04
2.4600	52.69	1.96	53.16	2.06
2.4700	52.67	1.98	52.97	2.10
2.4800	52.66	1.99	52.90	2.10
2.4900	52.65	2.01	52.95	2.11
2.5000	52.64	2.02	52.60	2.14
2.5100	52.62	2.04	52.91	2.17
2.5200	52.61	2.05	52.99	2.15
2.5300	52.60	2.06	52.83	2.19
2.5400	52.59	2.08	52.71	2.20
2.5500	52.57	2.09	52.74	2.18

FLUID DIELECTRIC PARAMETERS							
Date:	21 Nov 2018	Fluid Temp:	22.9	Frequency:	2450MHz	Tissue:	Body
Freq (MHz)	Test_e	Test_s	Target_e	Target_s	Deviation Permittivity	Deviation Conductivity	
2350.0000		53.3100	1.9200	52.8300	1.85	0.91%	3.78%
2360.0000		53.2700	1.9400	52.8200	1.86	0.85%	4.30%
2370.0000		53.2300	1.9400	52.8100	1.87	0.80%	3.74%
2380.0000		53.1800	1.9600	52.7900	1.88	0.74%	4.26%
2390.0000		53.1500	1.9600	52.7800	1.89	0.70%	3.70%
2400.0000		53.2400	1.9900	52.7700	1.90	0.89%	4.74%
2402.0000	*	53.2140	1.9940	52.7660	1.90	0.85%	4.84%
2410.0000		53.1100	2.0100	52.7500	1.91	0.68%	5.24%
2420.0000		53.1200	2.0500	52.7400	1.92	0.72%	6.77%
2422.0000	*	53.1140	2.0460	52.7380	1.92	0.71%	6.45%
2430.0000		53.0900	2.0300	52.7300	1.93	0.68%	5.18%
2437.0000	*	53.1040	2.0440	52.7160	1.94	0.74%	5.52%
2440.0000		53.1100	2.0500	52.7100	1.94	0.76%	5.67%
2450.0000		52.9300	2.0400	52.7000	1.95	0.44%	4.62%
2460.0000		53.1600	2.0600	52.6900	1.96	0.89%	5.10%
2462.0000	*	53.1220	2.0680	52.6860	1.96	0.83%	5.30%
2470.0000		52.9700	2.1000	52.6700	1.98	0.57%	6.06%
2472.0000	*	52.9560	2.1000	52.6680	1.98	0.55%	5.95%
2480.0000		52.9000	2.1000	52.6600	1.99	0.46%	5.53%
2490.0000		52.9500	2.1100	52.6500	2.01	0.57%	4.98%
2500.0000		52.6000	2.1400	52.6400	2.02	-0.08%	5.94%
2510.0000		52.9100	2.1700	52.6200	2.04	0.55%	6.37%
2520.0000		52.9900	2.1500	52.6100	2.05	0.72%	4.88%
2530.0000		52.8300	2.1900	52.6000	2.06	0.44%	6.31%
2540.0000		52.7100	2.2000	52.5900	2.08	0.23%	5.77%
2550.0000		52.7400	2.1800	52.5700	2.09	0.32%	4.31%

\*Channel Frequency Tested

**Table 14.1 Fluid Dielectric Parameters 5250MHz BODY TSL**

\*\*\*\*\*  
 Aprel Laboratory  
 Test Result for UIM Dielectric Parameter  
 Mon 03/Dec/2018 14:16:41  
 Freq Frequency(GHz)  
 FCC\_eH FCC Bulletin 65 Supplement C ( June 2001) Limits for Head Epsilon  
 FCC\_sH FCC Bulletin 65 Supplement C (June 2001) Limits for Head Sigma  
 FCC\_eB FCC Limits for Body Epsilon  
 FCC\_sB FCC Limits for Body Sigma  
 Test\_e Epsilon of UIM  
 Test\_s Sigma of UIM  
 \*\*\*\*\*

Freq	FCC_eB	FCC_sB	Test_e	Test_s
5.1500	49.08	5.24	46.28	5.62
5.1600	49.07	5.25	46.17	5.63
5.1700	49.06	5.26	45.99	5.69
5.1800	49.04	5.28	45.92	5.64
5.1900	49.03	5.29	45.93	5.71
5.2000	49.01	5.30	45.94	5.69
5.2100	49.00	5.31	45.60	5.75
5.2200	48.99	5.32	45.78	5.73
5.2300	48.97	5.33	46.03	5.74
5.2400	48.96	5.35	45.62	5.75
5.2500	48.95	5.36	45.76	5.69
5.2600	48.93	5.37	45.83	5.86
5.2700	48.92	5.38	45.73	5.83
5.2800	48.91	5.39	45.59	5.80
5.2900	48.89	5.40	45.63	5.98
5.3000	48.88	5.42	45.49	5.84
5.3100	48.87	5.43	45.54	5.88
5.3200	48.85	5.44	45.55	5.90
5.3300	48.84	5.45	45.48	5.89
5.3400	48.82	5.46	45.72	5.88
5.3500	48.81	5.47	45.49	5.89

<b>FLUID DIELECTRIC PARAMETERS</b>							
Date:	3 Dec 2018	Fluid Temp:	22.8	Frequency:	5250MHz	Tissue:	Body
Freq (MHz)	Test_e	Test_s	Target_e	Target_s	Deviation Permittivity	Deviation Conductivity	
5150.0000		46.2800	5.6200	49.0800	5.24	-5.70%	7.25%
5160.0000		46.1700	5.6300	49.0700	5.25	-5.91%	7.24%
5170.0000		45.9900	5.6900	49.0600	5.26	-6.26%	8.17%
5180.0000	*	45.9200	5.6400	49.0400	5.28	-6.36%	6.82%
5190.0000		45.9300	5.7100	49.0300	5.29	-6.32%	7.94%
5200.0000	*	45.9400	5.6900	49.0100	5.30	-6.26%	7.36%
5210.0000		45.6000	5.7500	49.0000	5.31	-6.94%	8.29%
5220.0000		45.7800	5.7300	48.9900	5.32	-6.55%	7.71%
5230.0000		46.0300	5.7400	48.9700	5.33	-6.00%	7.69%
5240.0000	*	45.6200	5.7500	48.9600	5.35	-6.82%	7.48%
5250.0000		45.7600	5.6900	48.9500	5.36	-6.52%	6.16%
5260.0000		45.8300	5.8600	48.9300	5.37	-6.34%	9.12%
5270.0000		45.7300	5.8300	48.9200	5.38	-6.52%	8.36%
5280.0000		45.5900	5.8000	48.9100	5.39	-6.79%	7.61%
5290.0000		45.6300	5.9800	48.8900	5.40	-6.67%	10.74%
5300.0000		45.4900	5.8400	48.8800	5.42	-6.94%	7.75%
5310.0000		45.5400	5.8800	48.8700	5.43	-6.81%	8.29%
5320.0000		45.5500	5.9000	48.8500	5.44	-6.76%	8.46%
5330.0000		45.4800	5.8900	48.8400	5.45	-6.88%	8.07%
5340.0000		45.7200	5.8800	48.8200	5.46	-6.35%	7.69%
5350.0000		45.4900	5.8900	48.8100	5.47	-6.80%	7.68%

\*Channel Frequency Tested

**Table 14.2 Fluid Dielectric Parameters 5750MHz BODY TSL**

\*\*\*\*\*  
 Aprel Laboratory  
 Test Result for UIM Dielectric Parameter  
 Fri 07/Dec/2018 09:12:02  
 Freq Frequency(GHz)  
 FCC\_eHFCC Bulletin 65 Supplement C ( June 2001) Limits for Head Epsilon  
 FCC\_sHFCC Bulletin 65 Supplement C (June 2001) Limits for Head Sigma  
 FCC\_eBFCC Limits for Body Epsilon  
 FCC\_sBFCC Limits for Body Sigma  
 Test\_e Epsilon of UIM  
 Test\_s Sigma of UIM  
 \*\*\*\*\*

Freq	FCC_eB	FCC_sB	Test_e	Test_s
5.7500	48.27	5.94	43.85	6.48
5.7600	48.25	5.95	43.67	6.43
5.7700	48.24	5.96	43.68	6.49
5.7800	48.23	5.98	43.61	6.50
5.7900	48.21	5.99	43.75	6.44
5.8000	48.20	6.00	43.89	6.43
5.8100	48.19	6.01	43.89	6.52
5.8200	48.17	6.02	43.30	6.51
5.8300	48.16	6.04	43.72	6.59
5.8400	48.15	6.05	43.87	6.61
5.8500	48.13	6.06	43.37	6.53
5.8600	48.12	6.07	43.24	6.61
5.8700	48.10	6.08	43.53	6.66
5.8800	48.09	6.09	43.30	6.58
5.8900	48.08	6.11	43.39	6.60
5.9000	48.06	6.12	43.04	6.63
5.9100	48.05	6.13	43.16	6.67
5.9200	48.04	6.14	43.20	6.71
5.9300	48.02	6.15	43.61	6.78
5.9400	48.01	6.16	43.39	6.75
5.9500	48.00	6.18	43.23	6.78

<b>FLUID DIELECTRIC PARAMETERS</b>							
Date:	7 Dec 2018	Fluid Temp:	22.5	Frequency:	5750MHz	Tissue:	Head
Freq (MHz)	Test_e	Test_s	Target_e	Target_s	Deviation Permittivity	Deviation Conductivity	
5750.0000		43.8500	6.4800	48.2700	5.94	-9.16%	9.09%
5760.0000		43.6700	6.4300	48.2500	5.95	-9.49%	8.07%
5765.0000	*	43.6750	6.4600	48.2450	5.96	-9.47%	8.48%
5770.0000		43.6800	6.4900	48.2400	5.96	-9.45%	8.89%
5780.0000		43.6100	6.5000	48.2300	5.98	-9.58%	8.70%
5790.0000		43.7500	6.4400	48.2100	5.99	-9.25%	7.51%
5795.0000	*	43.8200	6.4350	48.2050	6.00	-9.10%	7.34%
5800.0000		43.8900	6.4300	48.2000	6.00	-8.94%	7.17%
5810.0000		43.8900	6.5200	48.1900	6.01	-8.92%	8.49%
5820.0000		43.3000	6.5100	48.1700	6.02	-10.11%	8.14%
5825.0000	*	43.5100	6.5500	48.1650	6.03	-9.66%	8.62%
5830.0000		43.7200	6.5900	48.1600	6.04	-9.22%	9.11%
5840.0000		43.8700	6.6100	48.1500	6.05	-8.89%	9.26%
5850.0000		43.3700	6.5300	48.1300	6.06	-9.89%	7.76%
5860.0000		43.2400	6.6100	48.1200	6.07	-10.14%	8.90%
5870.0000		43.5300	6.6600	48.1000	6.08	-9.50%	9.54%
5880.0000		43.3000	6.5800	48.0900	6.09	-9.96%	8.05%
5890.0000		43.3900	6.6000	48.0800	6.11	-9.75%	8.02%
5900.0000		43.0400	6.6300	48.0600	6.12	-10.45%	8.33%
5910.0000		43.1600	6.6700	48.0500	6.13	-10.18%	8.81%
5920.0000		43.2000	6.7100	48.0400	6.14	-10.07%	9.28%
5930.0000		43.6100	6.7800	48.0200	6.15	-9.18%	10.24%
5940.0000		43.3900	6.7500	48.0100	6.16	-9.62%	9.58%
5950.0000		43.2300	6.7800	48.0000	6.18	-9.94%	9.71%

\*Channel Frequency Tested

## 15.0 SYSTEM VERIFICATION TEST RESULTS

Table 15.0 System Verification Results 2450MHz BODY TSL

System Verification Test Results					
Date		Frequency (MHz)	Validation Source		
			P/N		S/N
21 Nov 2018		2450	D2450V2		825
Fluid Type	Fluid Temp °C	Ambient Temp °C	Ambient Humidity (%)	Forward Power (mW)	Source Spacing (mm)
Body	22.9	23	28%	250	10
Fluid Parameters					
Permittivity			Conductivity		
Measured	Target	Deviation	Measured	Target	Deviation
52.93	52.70	0.44%	2.04	1.95	4.62%
Measured SAR					
1 gram			10 gram		
Measured	Target	Deviation	Measured	Target	Deviation
13.80	13.00	6.15%	6.39	6.05	5.62%
Measured SAR Normalized to 1.0W					
1 gram			10 gram		
Normalized	Target	Deviation	Normalized	Target	Deviation
55.20	50.70	8.88%	25.56	23.80	7.39%
<p>Prior to the SAR evaluations, system checks were performed on the planar section of the phantom and a SPEAG validation dipole in accordance with the procedures described in IEEE 1528-2013, FCC KDB 846224 and IEC 62209-1.</p> <p>The dielectric parameters of the simulated tissue mixture were measured prior to the system performance check using a Dielectric Probe Kit and a Network Analyzer.</p> <p>The forward power was applied to the dipole and the system was verified to a tolerance of +10% from the system manufacturer's dipole calibration target SAR value.</p> <p>The forward power applied was same forward power applied by the calibration lab during the calibration of this validation source.</p>					

**Table 15.1 System Verification Results 5250MHz BODY TSL**

<b>System Verification Test Results</b>					
Date		Frequency (MHz)	Validation Source		
			P/N		S/N
03 Dec 2018		5250	D5GHzV2		1031
Fluid Type	Fluid Temp °C	Ambient Temp °C	Ambient Humidity (%)	Forward Power (mW)	Source Spacing (mm)
Body	22.8	23	28%	71	10
Fluid Parameters					
Permittivity			Conductivity		
Measured	Target	Deviation	Measured	Target	Deviation
45.76	48.95	-6.52%	5.69	5.36	6.16%
Measured SAR					
1 gram			10 gram		
Measured	Target	Deviation	Measured	Target	Deviation
5.01	5.45	-8.07%	1.40	1.52	-7.89%
Measured SAR Normalized to 1.0W					
1 gram			10 gram		
Normalized	Target	Deviation	Normalized	Target	Deviation
70.56	76.76	-8.08%	19.72	21.41	-7.89%
<p>Prior to the SAR evaluations, system checks were performed on the planar section of the phantom and a SPEAG validation dipole in accordance with the procedures described in IEEE 1528-2013, FCC KDB 846224 and IEC 62209-1.</p> <p>The dielectric parameters of the simulated tissue mixture were measured prior to the system performance check using a Dielectric Probe Kit and a Network Analyzer.</p> <p>The forward power was applied to the dipole and the system was verified to a tolerance of +10% from the system manufacturer's dipole calibration target SAR value.</p> <p>The forward power applied was same forward power applied by the calibration lab during the calibration of this validation source.</p>					

**Table 15.2 System Verification Results 5750MHz BODY TSL**

<b>System Verification Test Results</b>					
Date		Frequency (MHz)	Validation Source		
			P/N		S/N
07 Dec 2018		5750	D5GHzV2		1031
Fluid Type	Fluid Temp °C	Ambient Temp °C	Ambient Humidity (%)	Forward Power (mW)	Source Spacing (mm)
Body	22.5	24	28%	72	10
Fluid Parameters					
Permittivity			Conductivity		
Measured	Target	Deviation	Measured	Target	Deviation
43.85	48.27	-9.16%	6.48	5.94	9.09%
Measured SAR					
1 gram			10 gram		
Measured	Target	Deviation	Measured	Target	Deviation
5.15	5.54	-7.04%	1.43	1.53	-6.54%
Measured SAR Normalized to 1.0W					
1 gram			10 gram		
Normalized	Target	Deviation	Normalized	Target	Deviation
71.53	76.94	-7.03%	19.86	21.25	-6.54%
<p>Prior to the SAR evaluations, system checks were performed on the planar section of the phantom and a SPEAG validation dipole in accordance with the procedures described in IEEE 1528-2013, FCC KDB 846224 and IEC 62209-1.</p> <p>The dielectric parameters of the simulated tissue mixture were measured prior to the system performance check using a Dielectric Probe Kit and a Network Analyzer.</p> <p>The forward power was applied to the dipole and the system was verified to a tolerance of +10% from the system manufacturer's dipole calibration target SAR value.</p> <p>The forward power applied was same forward power applied by the calibration lab during the calibration of this validation source.</p>					

## 16.0 SYSTEM VALIDATION SUMMARY

**Table 16.0 System Validation Summary**

System Validation Summary											
Frequency (MHz)	Validation Date	Probe Model	Probe S/N	Validation Source	Source S/N	Tissue	Tissue Dielectrics		Validation Results		
							Permittivity	Conductivity	Sensitivity	Linearity	Isotropy
30		EX3DV4	3600	CLA-30	1005	Head					
150	03-May-17	EX3DV4	3600	CLA-150	4007	Body	66.48	0.79	Pass	Pass	Pass
150	04-May-17	EX3DV4	3600	CLA-150	4007	Head	51.51	0.81	Pass	Pass	Pass
450	08-May-17	EX3DV4	3600	D450V3	1068	Body	54.65	0.95	Pass	Pass	Pass
450	16-May-17	EX3DV4	3600	D450V3	1068	Head	43.70	0.83	Pass	Pass	Pass
835	03-May-18	EX3DV4	3600	D835V2	4d075	Body	53.31	1.00	Pass	Pass	Pass
835	19-May-17	EX3DV4	3600	D835V2	4d075	Head	42.01	0.89	Pass	Pass	Pass
900	08-May-18	EX3DV4	3600	D900V2	045	Body	54.46	1.10	Pass	Pass	Pass
900	02-Aug-17	EX3DV4	3600	D900V2	045	Head	39.10	0.93	Pass	Pass	Pass
1640	06-May-18	EX3DV4	3600	1620-S-2	207-00102	Body	39.87	1.27	Pass	Pass	Pass
1640	07-May-18	EX3DV4	3600	1620-S-2	207-00102	Head	39.87	1.27	Pass	Pass	Pass
1800	21-Jul-17	EX3DV4	3600	D1800V2	247	Body	54.77	1.53	Pass	Pass	Pass
1800	18-Jul-17	EX3DV4	3600	D1800V2	247	Head	40.70	1.33	Pass	Pass	Pass
2450	23-May-18	EX3DV4	3600	D2450V2	825	Body	49.51	1.92	Pass	Pass	Pass
2450	24-May-18	EX3DV4	3600	D2450V2	825	Head	37.95	1.87	Pass	Pass	Pass
5250	24-Jul-18	EX3DV4	3600	D5GHzV2	1031	Body	46.42	5.69	Pass	Pass	Pass
5250	24-Jul-18	EX3DV4	3600	D5GHzV2	1031	Head	35.96	4.99	Pass	Pass	Pass
5750	25-Jul-18	EX3DV4	3600	D5GHzV2	1031	Body	47.10	5.60	Pass	Pass	Pass

## 17.0 MEASUREMENT SYSTEM SPECIFICATIONS

Table 17.0 Measurement System Specifications

Measurement System Specification	
<b>Specifications</b>	
Positioner	Stäubli Unimation Corp. Robot Model: TX90XL
Repeatability	+/- 0.035 mm
No. of axis	6.0
<b>Data Acquisition Electronic (DAE) System</b>	
<b>Cell Controller</b>	
Processor	Intel(R) Core(TM) i7-7700
Clock Speed	3.60 GHz
Operating System	Windows 10 Professional
<b>Data Converter</b>	
Features	Signal Amplifier, multiplexer, A/D converter, and control logic
Software	Measurement Software: DASY6, V 6.4.0.12171 / DASY52 V52.10.0.1446 Postprocessing Software: SEMCAD X, V14.6.10( Deployment Build )
Connecting Lines	Optical downlink for data and status info., Optical uplink for commands and clock
<b>DASY Measurement Server</b>	
Function	Real-time data evaluation for field measurements and surface detection
Hardware	Intel ULV Celeron CPU 400 MHz; 128 MB chip disk; 128 MB RAM
Connections	COM1, COM2, DAE, Robot, Ethernet, Service Interface
<b>E-Field Probe</b>	
Model	EX3DV4
Serial No.	3600
Construction	Triangular core fiber optic detection system
Frequency	10 MHz to 6 GHz
Linearity	±0.2 dB (30 MHz to 3 GHz)
<b>Phantom</b>	
Type	ELI Elliptical Planar Phantom
Shell Material	Fiberglass
Thickness	2mm +/- .2mm
Volume	> 30 Liter

Measurement System Specification		
Probe Specification		
Construction:	Symmetrical design with triangular core; Built-in shielding against static charges PEEK enclosure material (resistant to organic solvents, glycol)	
Calibration:	In air from 10 MHz to 2.5 GHz In head simulating tissue at frequencies of 900 MHz and 1.8 GHz (accuracy $\pm 8\%$ )	
Frequency:	10 MHz to > 6 GHz; Linearity: $\pm 0.2$ dB (30 MHz to 3 GHz)	
Directivity:	$\pm 0.2$ dB in head tissue (rotation around probe axis) $\pm 0.4$ dB in head tissue (rotation normal to probe axis)	
Dynamic Range:	5 $\mu$ W/g to > 100 mW/g; Linearity: $\pm 0.2$ dB	
Surface Detect:	$\pm 0.2$ mm repeatability in air and clear liquids over diffuse reflecting surfaces	
Dimensions:	Overall length: 330 mm; Tip length: 16 mm; Body diameter: 12 mm; Tip diameter: 6.8 mm Distance from probe tip to dipole centers: 2.7 mm	
Application:	General dosimetry up to 3 GHz; Compliance tests of mobile phone	
Phantom Specification		
<p>The ELI V5.0 phantom is an elliptical planar fiberglass shell phantom with a shell thickness of 2.0mm +/- .2mm at the planar area. This phantom conforms to OET Bulletin 65, Supplement C, IEEE 1528-2013, IEC 62209-1 and IEC 62209-2.</p>		
		<b>ELI Phantom</b>
Device Positioner Specification		
<p>The DASY device positioner has two scales for device rotation (with respect to the body axis) and the device inclination (with respect to the line between the ear openings). The plane between the ear openings and the mouth tip has a rotation angle of <math>65^\circ</math>. The bottom plate contains three pair of bolts for locking the device holder. The device holder positions are adjusted to the standard measurement positions in the three sections.</p>		
		<b>Device Positioner</b>

## 18.0 TEST EQUIPMENT LIST

**Table 18.0 Equipment List and Calibration**

Test Equipment List				
DESCRIPTION	ASSET NO.	SERIAL NO.	DATE CALIBRATED	CALIBRATION DUE
Schmid & Partner DASY 6 System	-	-	-	-
-DASY Measurement Server	00158	1078	CNR	CNR
-Robot	00046	599396-01	CNR	CNR
-DAE4	00019	353	20-Apr-18	20-Apr-19
-EX3DV4 E-Field Probe	00213	3600	25-Apr-18	25-Apr-19
-CLA 30 Validation Dipole	00300	1005	23-Nov-17	23-Nov-20
-CLA150 Validation Dipole	00251	4007	27-Apr-17	27-Apr-20
-D450V3 Validation Dipole	00221	1068	23-Apr-18	23-Apr-21
-D835V2 Validation Dipole	00217	4D075	20-Apr-18	20-Apr-21
-D900V2 Validation Dipole	00020	54	24-Apr-17	24-Apr-20
-D1640/1620-S-2 Validation Dipole	00299	207-00102	07-Nov-17	07-Nov-20
-D2450V2 Validation Dipole	00219	825	24-Apr-18	24-Apr-21
-D5GHzV2 Validation Dipole	00126	1031	26-Apr-18	26-Apr-21
ELI Phantom	00247	-	CNR	CNR
HP 85070C Dielectric Probe Kit	00033	none	CNR	CNR
Gigatronics 8652A Power Meter	00110	1835801	29-Feb-16	29-Feb-19
Gigatronics 80701A Power Sensor	00248	1833687	29-Feb-16	29-Feb-19
HP 8753ET Network Analyzer	00134	US39170292	29-Dec-17	29-Dec-20
Rohde & Schwarz SMR20 Signal Generator	00006	100104	29-May-17	29-May-20
Amplifier Research 10W1000C Power Amplifier	00041	27887	CNR	CNR
Amplifier Research 5S1G4 Power Amplifier	00106	26235	CNR	CNR
Narda Directional Coupler 3020A	00064	-	CNR	CNR
Traceable VWR Thermometer	00291	-	19-Nov-16	19-Nov-19
Traceable VWR Jumbo Humidity/Thermometer	00295	170120555	17-Feb-17	17-Feb-20
DC-18G 10W 30db Attenuator	00102	-	COU	COU
R&S FSP40 Spectrum Analyzer	00241	100500	15-May-18	15-May-21
RF Cable-SMA	00311	-	CNR	CNR
HP Calibration Kit	00145	-	10-Feb-17	10-Feb-20

CNR = Calibration Not Required

COU = Calibrate on Use

## 19.0 FLUID COMPOSITION

**Table 19.0 Fluid Composition 2450MHz BODY TSL**

<b>Tissue Simulating Liquid (TSL) Composition</b>				
<b>Component by Percent Weight</b>				
<b>Water</b>	<b>Glycol</b>	<b>Salt<sup>(1)</sup></b>	<b>HEC<sup>(2)</sup></b>	<b>Bacteriacide<sup>(3)</sup></b>
69.98	30.0	0.02	0.0	0.0

(1) Non-Iodized

(2) HydroxyEthyl-Cellulose: Sigma-Aldrich P/N 54290-500g

(3) Dow Chemical Dowicil 75 Antimicrobial Preservative

**Table 19.1 Fluid Composition 5250MHz BODY TSL**

This is a proprietary composition by SPEAG.

## APPENDIX A – SYSTEM VERIFICATION PLOTS

Date/Time: 11/21/2018 11:03:44 AM

Test Laboratory: Celltech Labs

**SPC-2450B Nov 21 2018**

**DUT: Dipole 2450 MHz D2450V2; Type: D2450V2; Serial: D2450V2 - SN:825**

Communication System: UID 0, CW (0); Communication System Band: FullSpan (0.0 - 6000.0 MHz); Frequency: 2450 MHz; Communication System PAR: 0 dB; PMF: 1

Medium: TSL\_2450B[21NV18]

Medium parameters used:  $f = 2450$  MHz;  $\sigma = 2.04$  S/m;  $\epsilon_r = 52.93$ ;  $\rho = 1000$  kg/m<sup>3</sup>

Phantom section: Flat Section

Measurement Standard: DASYS (IEEE/IEC/ANSI C63.19-2011)

DASY Configuration:

- Probe: EX3DV4 - SN3600; ConvF(6.54, 6.54, 6.54); Calibrated: 4/25/2018, ConvF(6.54, 6.54, 6.54); Calibrated: 4/25/2018, ConvF(6.54, 6.54, 6.54); Calibrated: 4/25/2018;
  - Modulation Compensation:
- Sensor-Surface: 4mm (Mechanical Surface Detection),  $z = -1.5, 31.0, 151.0$
- Electronics: DAE4 Sn353; Calibrated: 4/20/2018
- Phantom: ELI V5.0 (20deg probe tilt); Type: QD OVA 002 Ax;
- DASYS2 52.10.1(1476);

**Frequency: 2450 MHz**

**SPC/SPC 2450B Input=250mw, 1g Target=13.0W/kg, 10g Target=6.05W/kg/Area Scan (4x9x1):** Measurement grid: dx=12mm, dy=12mm  
Maximum value of SAR (measured) = 13.7 W/kg

**SPC/SPC 2450B Input=250mw, 1g Target=13.0W/kg, 10g Target=6.05W/kg/Zoom Scan (7x7x7)/Cube 0:** Measurement grid: dx=5mm, dy=5mm, dz=5mm

Reference Value = 87.32 V/m; Power Drift = 0.05 dB

Peak SAR (extrapolated) = 28.2 W/kg

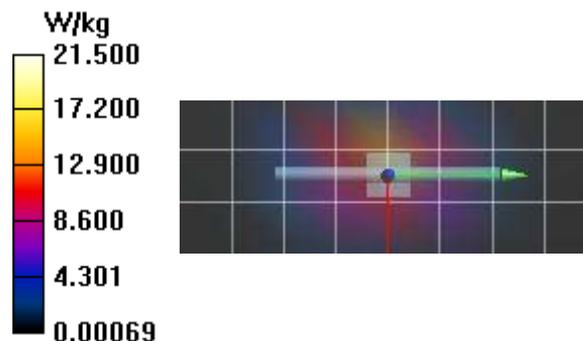
**SAR(1 g) = 13.8 W/kg; SAR(10 g) = 6.39 W/kg**

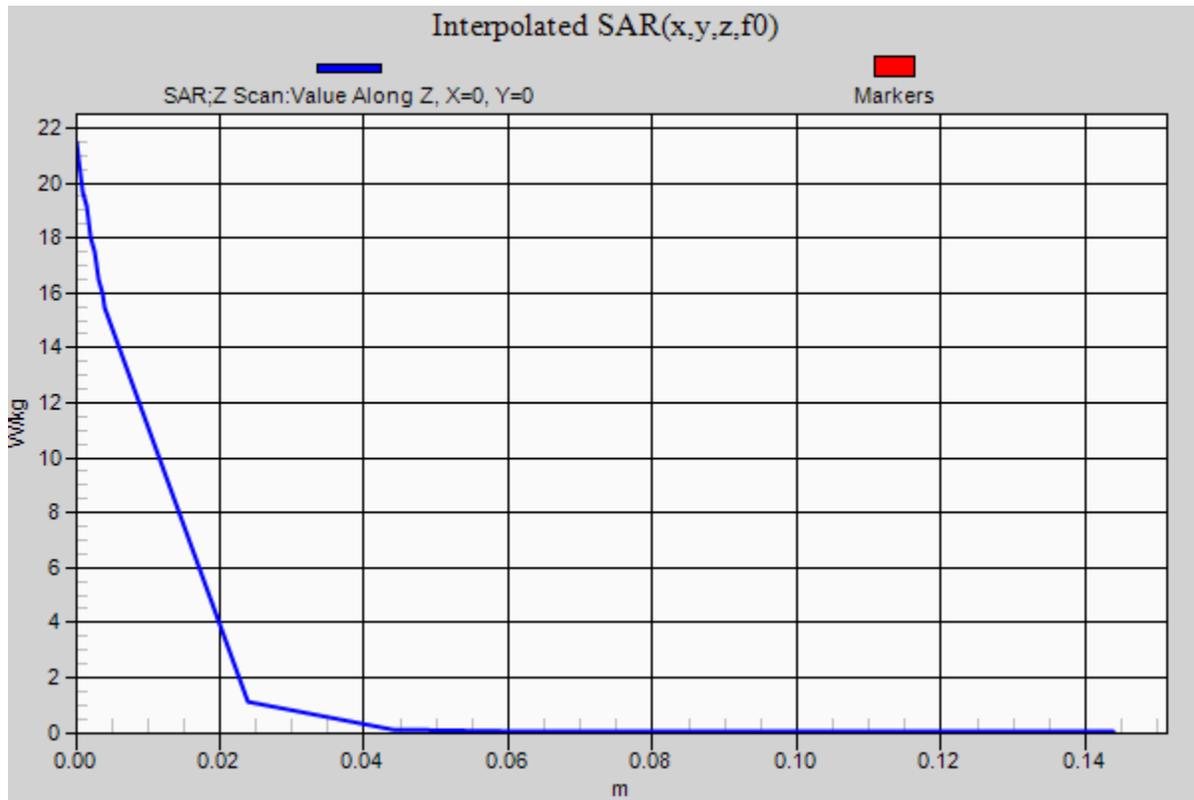
Maximum value of SAR (measured) = 15.9 W/kg

**SPC/SPC 2450B Input=250mw, 1g Target=13.0W/kg, 10g Target=6.05W/kg/Z Scan (1x1x19):** Measurement grid: dx=20mm, dy=20mm, dz=20mm

Penetration depth = n/a (n/a, 7.701) [mm]

Maximum value of SAR (interpolated) = 21.5 W/kg





Date/Time: 12/3/2018 2:47:23 PM, Date/Time: 12/3/2018 2:49:54 PM

Test Laboratory: Celltech Labs

**SPC-5250B Dec 03 2018**

**DUT: Dipole D5GHzV2; Type: D5GHzV2; Serial: D5GHzV2 - SN:1031**

Communication System: UID 0, CW (0); Communication System Band: FullSpan (0.0 - 6000.0 MHz); Frequency: 5250 MHz; Communication System PAR: 0 dB; PMF: 1

Medium: TSL\_5250B[03DE18]  
 Medium parameters used:  $f = 5250$  MHz;  $\sigma = 5.69$  S/m;  $\epsilon_r = 45.76$ ;  $\rho = 1000$  kg/m<sup>3</sup>  
 Phantom section: Flat Section  
 Measurement Standard: DASY5 (IEEE/IEC/ANSI C63.19-2011)

DASY Configuration:

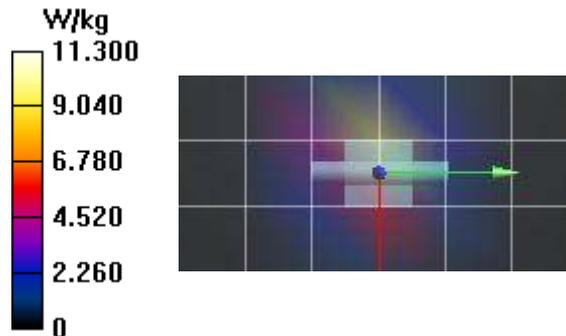
- Probe: EX3DV4 - SN3600; ConvF(4.02, 4.02, 4.02); Calibrated: 4/25/2018, ConvF(4.02, 4.02, 4.02); Calibrated: 4/25/2018, ConvF(4.02, 4.02, 4.02); Calibrated: 4/25/2018;
- Modulation Compensation:
- Sensor-Surface: 2mm (Mechanical Surface Detection),  $z = -1.5, 25.0, 151.0$
- Electronics: DAE4 Sn353; Calibrated: 4/20/2018
- Phantom: ELI V5.0 (20deg probe tilt); Type: QD OVA 002 Ax;
- DASY52 52.10.1(1476);

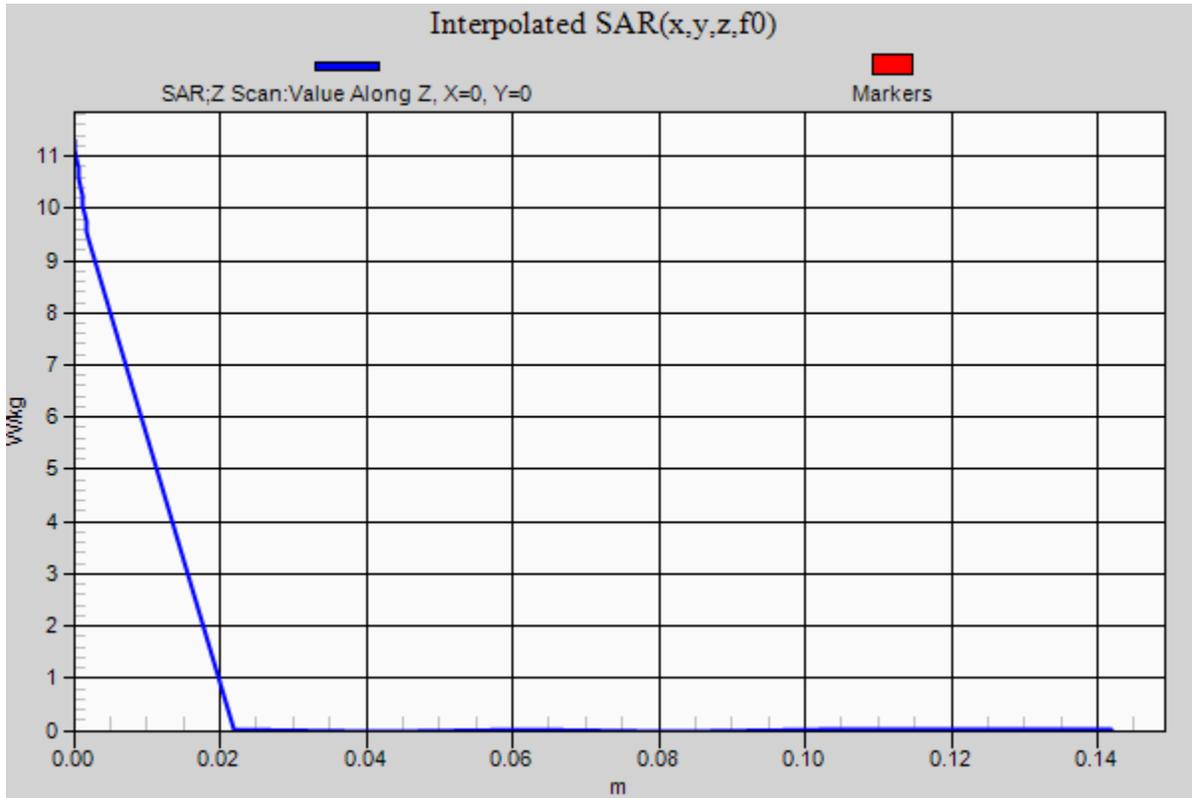
**Frequency: 5250 MHz**

**SPC/SPC 5250B Input=71 mw, Target=7.68@100mw/Area Scan (4x7x1):** Measurement grid: dx=10mm, dy=10mm  
 Maximum value of SAR (measured) = 9.62 W/kg

**SPC/SPC 5250B Input=71 mw, Target=7.68@100mw/Zoom Scan (7x7x13)/Cube 0:** Measurement grid: dx=4mm, dy=4mm, dz=2mm  
 Reference Value = 31.44 V/m; Power Drift = 0.09 dB  
 Peak SAR (extrapolated) = 20.7 W/kg  
**SAR(1 g) = 5.01 W/kg; SAR(10 g) = 1.4 W/kg**  
 Maximum value of SAR (measured) = 10.6 W/kg

**SPC/SPC 5250B Input=71 mw, Target=7.68@100mw/Z Scan (1x1x19):** Measurement grid: dx=20mm, dy=20mm, dz=20mm  
 Penetration depth = n/a (n/a, 3.041) [mm]  
 Maximum value of SAR (interpolated) = 11.3 W/kg





Date/Time: 12/7/2018 11:16:06 AM, Date/Time: 12/7/2018 11:18:36 AM

Test Laboratory: Celltech Labs

**SPC-5750B Dec 07 2018**

**DUT: Dipole D5GHzV2; Type: D5GHzV2; Serial: D5GHzV2 –SN:1031**

Communication System: UID 0, CW (0); Communication System Band: FullSpan (0.0 - 6000.0 MHz); Frequency: 5750 MHz; Communication System PAR: 0 dB; PMF: 1

Medium: TSL\_5750[07DE18]  
 Medium parameters used:  $f = 5750$  MHz;  $\sigma = 6.48$  S/m;  $\epsilon_r = 43.85$ ;  $\rho = 1000$  kg/m<sup>3</sup>  
 Phantom section: Flat Section  
 Measurement Standard: DASYS (IEEE/IEC/ANSI C63.19-2011)

DASY Configuration:

- Probe: EX3DV4 - SN3600; ConvF(3.7, 3.7, 3.7); Calibrated: 4/25/2018, ConvF(3.7, 3.7, 3.7); Calibrated: 4/25/2018, ConvF(3.7, 3.7, 3.7); Calibrated: 4/25/2018;
- Modulation Compensation:
- Sensor-Surface: 2mm (Mechanical Surface Detection),  $z = -1.5, 25.0, 151.0$
- Electronics: DAE4 Sn353; Calibrated: 4/20/2018
- Phantom: ELI V5.0 (20deg probe tilt); Type: QD OVA 002 Ax;
- DASYS2 52.10.1(1476);

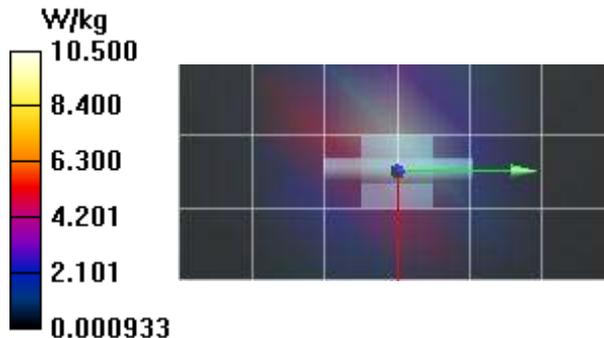
**Frequency: 5750 MHz**

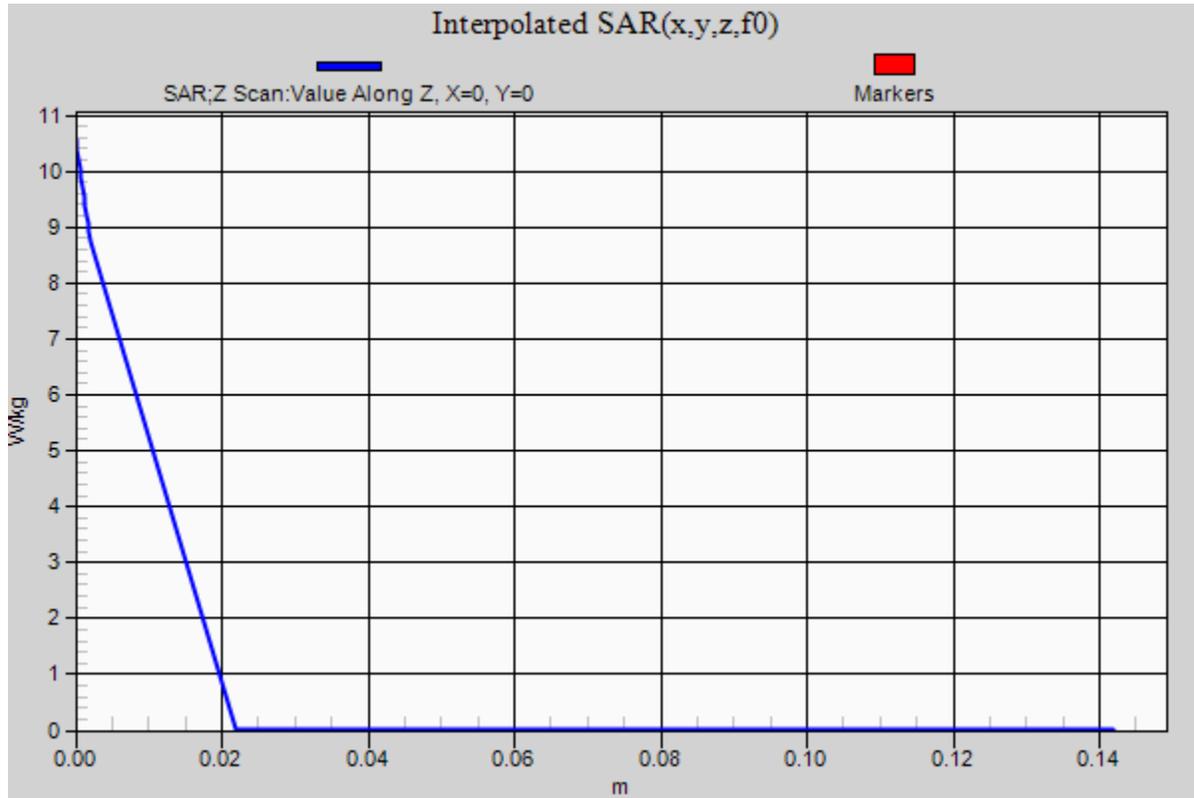
**SPC/SPC 5750B Input=72 mw, Target=7.69W/kg@100mw/Area Scan (4x7x1):** Measurement grid: dx=10mm, dy=10mm  
 Maximum value of SAR (measured) = 10.6 W/kg

**SPC/SPC 5750B Input=72 mw, Target=7.69W/kg@100mw/Zoom Scan (7x7x13)/Cube 0:** Measurement grid: dx=4mm, dy=4mm, dz=2mm  
 Reference Value = 27.32 V/m; Power Drift = 0.12 dB  
 Peak SAR (extrapolated) = 23.3 W/kg  
**SAR(1 g) = 5.15 W/kg; SAR(10 g) = 1.43 W/kg**

Maximum value of SAR (measured) = 11.0 W/kg

**SPC/SPC 5750B Input=72 mw, Target=7.69W/kg@100mw/Z Scan (1x1x19):** Measurement grid: dx=20mm, dy=20mm, dz=20mm  
 Penetration depth = n/a (n/a, 2.386) [mm]  
 Maximum value of SAR (interpolated) = 10.5 W/kg





## APPENDIX B – MEASUREMENT PLOTS OF MAXIMUM MEASURED SAR

### Plot B1

Date/Time: 11/21/2018 11:53:49 AM

Test Laboratory: Celltech Labs

**Garmin A03653-2450B Nov 21 2018**

**DUT: A03653; Type: Transmitter;**

Communication System: UID 10573 - AAA, IEEE 802.11b WiFi 2.4 GHz (DSSS, 5.5 Mbps, 77pc duty cycle); Communication System Band: WLAN 2.4GHz (2412.0 - 2484.0 MHz); Frequency: 2422 MHz; Communication System PAR: 1.14dB; PMF: 1.05925

Medium: TSL\_2450B[21NV18]

Medium parameters used (interpolated):  $f = 2422$  MHz;  $\sigma = 2.046$  S/m;  $\epsilon_r = 53.114$ ;  $\rho = 1000$  kg/m<sup>3</sup>

Phantom section: Flat Section

Measurement Standard: DASy5 (IEEE/IEC/ANSI C63.19-2011)

DASy Configuration:

- Probe: EX3DV4 - SN3600; ConvF(6.54, 6.54, 6.54); Calibrated: 4/25/2018, ConvF(6.54, 6.54, 6.54); Calibrated: 4/25/2018, ConvF(6.54, 6.54, 6.54); Calibrated: 4/25/2018;
  - Modulation Compensation: PMR for UID 10573 - AAA, Calibrated: 4/25/2018
- Sensor-Surface: 4mm (Mechanical Surface Detection (Locations From Previous Scan Used)), Sensor-Surface: 4mm (Mechanical Surface Detection),  $z = -1.5, 31.0, 151.0$
- Electronics: DAE4 Sn353; Calibrated: 4/20/2018
- Phantom: ELI V5.0 (20deg probe tilt); Type: QD OVA 002 Ax;
- DASy52 52.10.1(1476);

**Frequency: 2422 MHz**

**2450B/B1-A03653, Body-Back Side, 2422MHz,WIFI/Area Scan (13x19x1):** Measurement grid: dx=12mm, dy=12mm

Maximum value of SAR (measured) = 0.947 W/kg

**2450B/B1-A03653, Body-Back Side, 2422MHz,WIFI/Zoom Scan (7x7x7)/Cube 0:** Measurement grid: dx=5mm, dy=5mm, dz=5mm

Reference Value = 4.560 V/m; Power Drift = -0.43 dB

Peak SAR (extrapolated) = 1.84 W/kg

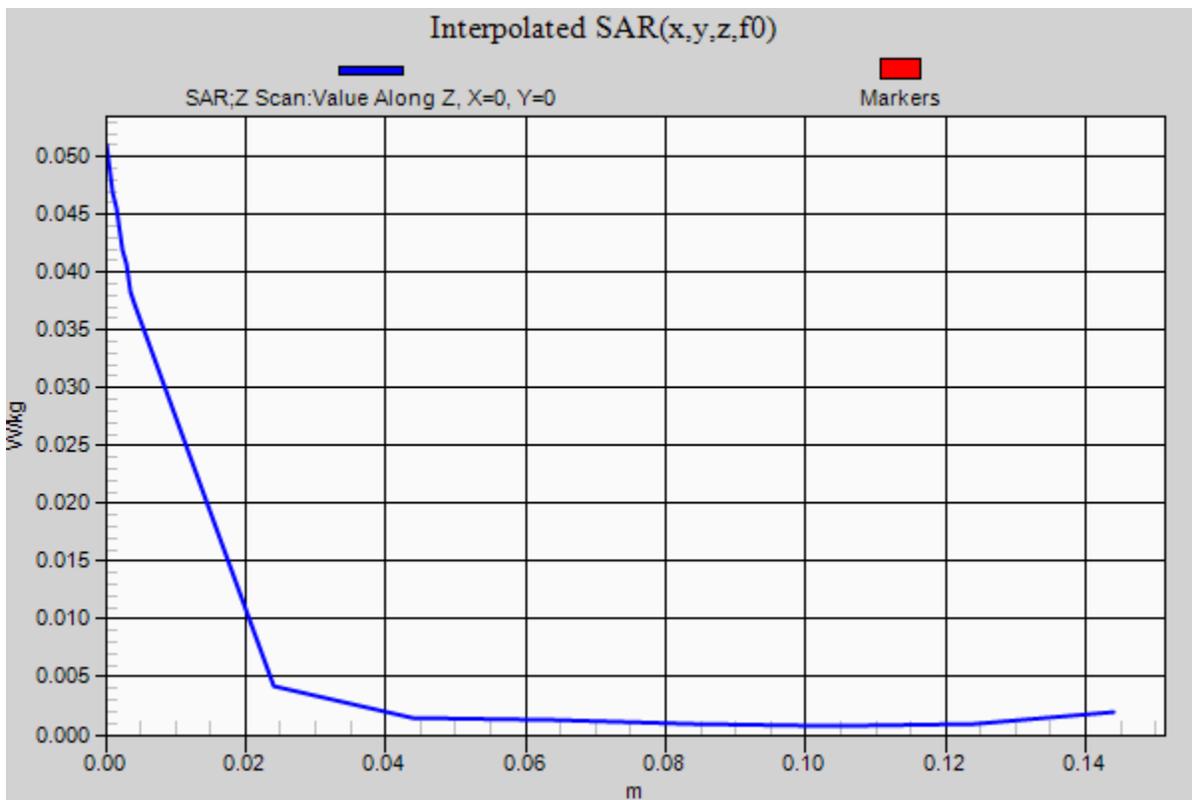
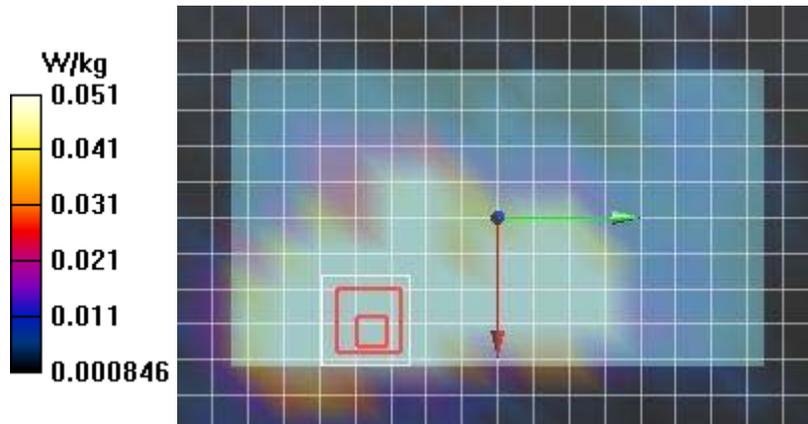
**SAR(1 g) = 0.793 W/kg; SAR(10 g) = 0.333 W/kg**

Maximum value of SAR (measured) = 0.935 W/kg

**2450B/B1-A03653, Body-Back Side, 2422MHz,WIFI/Z Scan (1x1x19):** Measurement grid: dx=20mm, dy=20mm, dz=20mm

Penetration depth = n/a (n/a, 9.207) [mm]

Maximum value of SAR (interpolated) = 0.0510 W/kg



**Plot B6\***

Date/Time: 11/22/2018 3:28:45 PM

Test Laboratory: Celltech Labs

**Garmin A03653-2450B Nov 22 2018**

**DUT: A03653; Type: Transmitter**

Communication System: UID 10030 - CAA, IEEE 802.15.1 Bluetooth (GFSK, DH1, 28pc duty cycle); Communication System Band: ISM 2.4 GHz Band (2400.0 - 2483.5 MHz); Frequency: 2402 MHz; Communication System PAR: 5.53dB; PMF: 1.83865

Medium: TSL\_2450B[21NV18]

Medium parameters used (interpolated):  $f = 2402$  MHz;  $\sigma = 1.994$  S/m;  $\epsilon_r = 53.214$ ;  $\rho = 1000$  kg/m<sup>3</sup>

Phantom section: Flat Section

Measurement Standard: DASYS5 (IEEE/IEC/ANSI C63.19-2011)

DASY Configuration:

- Probe: EX3DV4 - SN3600; ConvF(6.54, 6.54, 6.54); Calibrated: 4/25/2018, ConvF(6.54, 6.54, 6.54); Calibrated: 4/25/2018, ConvF(6.54, 6.54, 6.54); Calibrated: 4/25/2018;
  - Modulation Compensation: PMR for UID 10030 - CAA, Calibrated: 4/25/2018
- Sensor-Surface: 4mm (Mechanical Surface Detection (Locations From Previous Scan Used)), Sensor-Surface: 4mm (Mechanical Surface Detection),  $z = -1.5, 31.0, 151.0$
- Electronics: DAE4 Sn353; Calibrated: 4/20/2018
- Phantom: ELI V5.0 (20deg probe tilt); Type: QD OVA 002 Ax;
- DASYS5 52.10.1(1476);

**Frequency: 2402 MHz**

**2450B/B6-A03653, Body-Back Side, 2402MHz,BT-GFSK/Area Scan (13x19x1):** Measurement grid: dx=12mm, dy=12mm

Maximum value of SAR (measured) = 0.0106 W/kg

**2450B/B6-A03653, Body-Back Side, 2402MHz,BT-GFSK/Zoom Scan (7x7x7)/Cube 0:** Measurement grid: dx=5mm, dy=5mm, dz=5mm

Reference Value = 0.9130 V/m; Power Drift = -0.11 dB

Peak SAR (extrapolated) = 0.0240 W/kg

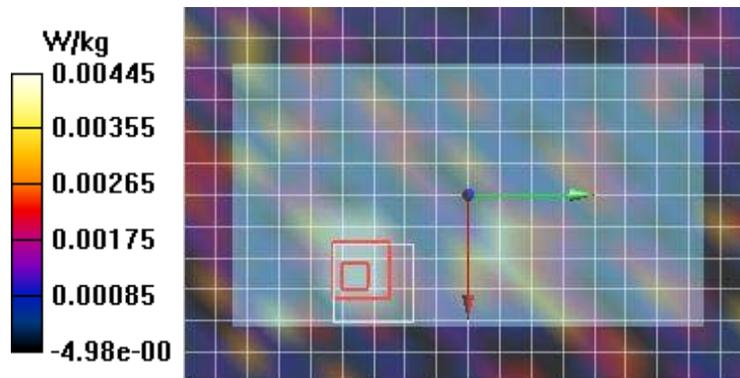
**SAR(1 g) = 0.00736 W/kg; SAR(10 g) = 0.00173 W/kg**

Maximum value of SAR (measured) = 0.00955 W/kg

**2450B/B6-A03653, Body-Back Side, 2402MHz,BT-GFSK/Z Scan (1x1x19):** Measurement grid: dx=20mm, dy=20mm, dz=20mm

Penetration depth = n/a (n/a, 10.75) [mm]

Maximum value of SAR (interpolated) = 0.00445 W/kg



**Plot B7**

Date/Time: 12/4/2018 12:11:42 PM, Date/Time: 12/4/2018 12:27:55 PM

Test Laboratory: Celltech Labs

**Garmin A03653-5250B Dec 04 2018**

**DUT: A03653; Type: Transmitter**

Communication System: UID 10317 - AAC, IEEE 802.11a WiFi 5 GHz (OFDM, 6 Mbps, 92pc duty cycle); Communication System Band: U-NII-1, U-NII-2A (5170 - 5330 MHz); Frequency: 5180 MHz; Communication System PAR: 0.375 dB; PMF: 1.04954

Medium: TSL\_5250B[03DE18]

Medium parameters used:  $f = 5180$  MHz;  $\sigma = 5.64$  S/m;  $\epsilon_r = 45.92$ ;  $\rho = 1000$  kg/m<sup>3</sup>

Phantom section: Flat Section

Measurement Standard: DASYS (IEEE/IEC/ANSI C63.19-2011)

DASY Configuration:

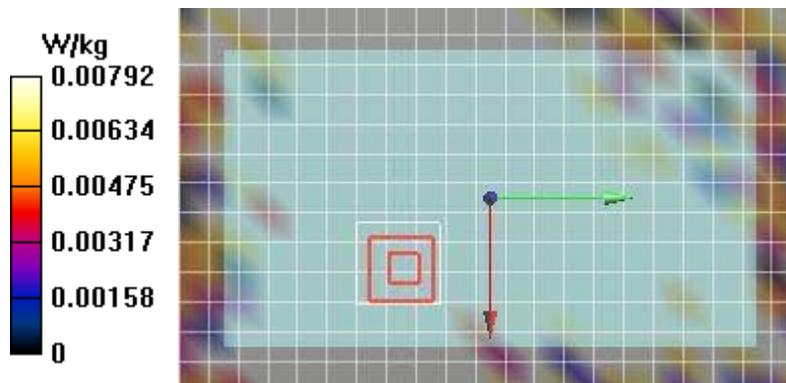
- Probe: EX3DV4 - SN3600; ConvF(4.02, 4.02, 4.02); Calibrated: 4/25/2018, ConvF(4.02, 4.02, 4.02); Calibrated: 4/25/2018, ConvF(4.02, 4.02, 4.02); Calibrated: 4/25/2018;
  - Modulation Compensation: PMR for UID 10317 - AAC, Calibrated: 4/25/2018
- Sensor-Surface: 4mm (Mechanical Surface Detection (Locations From Previous Scan Used)), Sensor-Surface: 2mm (Mechanical Surface Detection), Sensor-Surface: 4mm (Mechanical Surface Detection),  $z = -1.5, 25.0, 151.0$
- Electronics: DAE4 Sn353; Calibrated: 4/20/2018
- Phantom: ELI V5.0 (20deg probe tilt); Type: QD OVA 002 Ax;
- DASYS2 52.10.1(1476);

**Frequency: 5180 MHz**

**5250B/B7-A03653, Body-Back Side, 5180MHz,WIFI/Area Scan (14x22x1):** Measurement grid: dx=10mm, dy=10mm  
Maximum value of SAR (measured) = 0.822 W/kg

**5250B/B7-A03653, Body-Back Side, 5180MHz,WIFI/Zoom Scan (8x8x13)/Cube 0:** Measurement grid: dx=4mm, dy=4mm, dz=2mm  
Reference Value = 1.489 V/m; Power Drift = -0.05 dB  
Peak SAR (extrapolated) = 3.08 W/kg  
**SAR(1 g) = 0.890 W/kg; SAR(10 g) = 0.331 W/kg**  
Maximum value of SAR (measured) = 1.61 W/kg

**5250B/B7-A03653, Body-Back Side, 5180MHz,WIFI/Z Scan (1x1x19):** Measurement grid: dx=20mm, dy=20mm, dz=20mm  
Penetration depth = n/a (n/a, 7.627) [mm]  
Maximum value of SAR (interpolated) = 0.00792 W/kg



**Plot B11**

Date/Time: 12/7/2018 1:47:27 PM

Test Laboratory: Celltech Labs

**Garmin A03653-5750B Dec 07 2018**

**DUT: A03653; Type: Transmitter**

Communication System: UID 10590 - AAB, IEEE 802.11a/h WiFi 5 GHz (OFDM, 54 Mbps, 60pc duty cycle); Communication System Band: WLAN 5GHz (4915.0 - 5825.0 MHz); Frequency: 5795 MHz; Communication System PAR: 2.23 dB; PMF: 1.07523

Medium: TSL\_5750[07DE18]

Medium parameters used (interpolated):  $f = 5795$  MHz;  $\sigma = 6.435$  S/m;  $\epsilon_r = 43.82$ ;  $\rho = 1000$  kg/m<sup>3</sup>

Phantom section: Flat Section

Measurement Standard: DASYS (IEEE/IEC/ANSI C63.19-2011)

DASY Configuration:

- Probe: EX3DV4 - SN3600; ConvF(3.7, 3.7, 3.7); Calibrated: 4/25/2018, ConvF(3.7, 3.7, 3.7); Calibrated: 4/25/2018, ConvF(3.7, 3.7, 3.7); Calibrated: 4/25/2018;
  - Modulation Compensation: PMR for UID 10590 - AAB, Calibrated: 4/25/2018
- Sensor-Surface: 4mm (Mechanical Surface Detection (Locations From Previous Scan Used)), Sensor-Surface: 2mm (Mechanical Surface Detection), Sensor-Surface: 4mm (Mechanical Surface Detection),  $z = -1.5, 25.0, 151.0$
- Electronics: DAE4 Sn353; Calibrated: 4/20/2018
- Phantom: ELI V5.0 (20deg probe tilt); Type: QD OVA 002 Ax;
- DASY52 52.10.1(1476);

**Frequency: 5795 MHz**

**5750B/B11-A03653, Body-Back Side, 5795 MHz,WIFI/Area Scan (14x22x1):** Measurement grid: dx=10mm, dy=10mm

Maximum value of SAR (measured) = 0.716 W/kg

**5750B/B11-A03653, Body-Back Side, 5795 MHz,WIFI/Zoom Scan (7x7x13)/Cube 0:** Measurement grid: dx=4mm, dy=4mm, dz=2mm

Reference Value = 1.386 V/m; Power Drift = -0.33 dB

Peak SAR (extrapolated) = 3.62 W/kg

**SAR(1 g) = 0.802 W/kg; SAR(10 g) = 0.266 W/kg**

Maximum value of SAR (measured) = 1.61 W/kg

**5750B/B11-A03653, Body-Back Side, 5795 MHz,WIFI/Z Scan (1x1x19):** Measurement grid: dx=20mm, dy=20mm, dz=20mm

Penetration depth = n/a (n/a, 29.63) [mm]

Maximum value of SAR (interpolated) = 0.0288 W/kg

