



Test Report Serial Number: **45461468 R2.0**
 Test Report Date: **11 January 2019**
 Project Number: **1422**

SAR Test Report - New Certification

Applicant:



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

Maximum Reported 10g SAR			
FCC	Extremity	0.30	W/kg
ISED	Extremity	0.30	
General Pop. Limit:		4.00	

FCC ID:

IPH-A2670

Product Model Number / HVIN

AA2670

ISED Registration Number

1792A-A2670

Product Name / PMN

AA2670

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:

Ben Hewson, President

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Test Lab Certificate: 2470.01



IC Registration 3874A-1



FCC Registration: CA3874

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1.0 DOCUMENT CONTROL

Samples Tested By:	Trevor Whillock		
Report Prepared By:	Art Voss		
Report Reviewed By:	Ben Hewson		
Report Issue Number	Description	By	Report Issue Date
R0.0	Draft	Art Voss	31 October 2018
R1.0	Initial Release	Trevor Whillock	01 December 2018
R2.0	Revised Center frequency-Throughout Report	Trevor Whillock	11 January 2019

2.0 CLIENT AND DEVICE INFORMATION

Client Information	
Applicant Name	Garmin International Inc.
Applicant Address	1200 East 151 St.
	Olathe, KS,66062
	USA
DUT Information	
Device Identifier(s):	FCC ID IPH-A2670
	ISED: 1792A-A2670
Type of Equipment:	General Radio Service Equipment Operating in the Band(26.960-27.410MHz) RSS-236.
Device Model(s) / HVIN:	AA2670
Device Marketing Name / PMN:	AA2670
Test Sample Serial No.:	T/A Sample - Identical Prototype
Transmit Frequency Range:	27.045 MHz Fixed
Number of Channels:	See Section 8.0
Manuf. Max. Avg Rated Output Power:	28.71 dBm, Peak
Modulation:	CW
Duty Cycle:	100.0%
DUT Power Source:	5V USB, Internal Li-ion battery
Deviation(s) from standard/procedure:	None
Modification of DUT:	None

3.0 SCOPE OF EVALUATION

The AA2670, FCC ID: IPH-A2670, ISED: 1792A-A2670 is a hand held transceiver with one transmitter that operates in the 26.960-27.410 MHz frequency band at a fixed transmit frequency of 27.045 MHz. 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, RSS 102 and 236.

4.0 NORMATIVE REFERENCES

Normative References*	
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)
Industry Canada Spectrum Management & Telecommunications Policy RSS-236 Issue 1:	General Radio Service Equipment Operating in the Band 26.960 to 27.410MHz (Citizens Band)
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
* 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.

Applicant: Garmin International Inc.	Model / HVIN: AA2670	
Standard(s) Applied: FCC 47 CFR §2.1093 Health Canada's Safety Code 6	Measurement Procedure(s): FCC KDB 865664, FCC KDB 447498 Industry Canada RSS-102 Issue 5 and RSS-236 Issue 1 IEEE Standard 1528-2013, IEC 62209-2	
Reason For Issue: <input checked="" type="checkbox"/> New Certification <input type="checkbox"/> Class I Permissive Change <input type="checkbox"/> Class II Permissive Change	Use Group: <input checked="" type="checkbox"/> General Population / Uncontrolled <input type="checkbox"/> Occupational / Controlled	Limits Applied: <input type="checkbox"/> 1.6W/kg - 1g Volume <input type="checkbox"/> 8.0W/kg - 1g Volume <input checked="" type="checkbox"/> 4.0W/kg - 10g Volume
Reason for Change: Original Filing	Date(s) Evaluated: October 18th & 19th, 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.

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.



Art Voss, P.Eng.
Technical Manager
Celltech Labs Inc.

11 January 2019

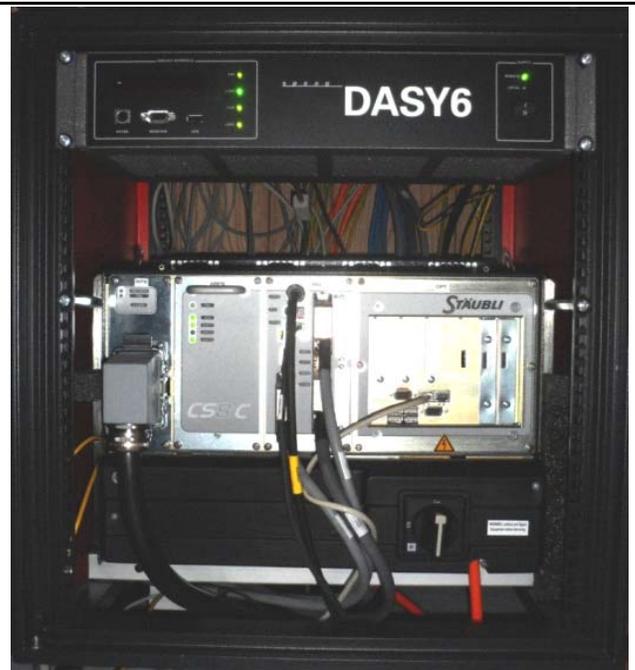
Date



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 - AA2670						
Channel	Frequency (MHz)	Measured Power (dBm)	Rated Power (dBm)	Rated Power (W)	Delta (dBm)	SAR Test Channel (Y/N)
1		28.71	28.71	0.743	0.00	Y

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 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

Due to the nature of the device, the device was capable of operating at a single fixed transmit frequency of 27.045 MHz preset by the manufacturer. As a result, SAR test evaluation was limited to one (1) test channel.

See Section 13.1 for DUT Setup and Configuration details

9.0 ACCESSORIES EVALUATED

Table 9.0 Accessories Evaluated

Test Report ID Number	Manufacturer's Part Number	Description	UDC Group ⁽¹⁾	Type II Group ⁽²⁾	SAR ⁽³⁾ Evaluated	SAR ⁽⁴⁾ Tested
B1	010-11022-20	Carabiner Clip (BLK/SLV)	n/a	n/a	Y	Y
B2	010-11022-10	Belt-Clip, Swivel (BLK/BLK)	n/a	n/a	Y	N
B3	010-11734-20	Belt Clip, Spine Mount (BLK, BLK)	n/a	n/a	Y	N
B6	010-12525-01	Floatation Lanyard	n/a	n/a	Y	N
B7	010-11733-00	Quick Release Lanyard	n/a	n/a	Y	N
B10	010-11855-00	Backpack Tether	n/a	n/a	Y	N
B11	010-10888-00	Retractable Lanyard	n/a	n/a	Y	N
B12	010-11854-00	Lanyard Carabiner	n/a	n/a	Y	N
P1	362-00091-00	AC Adapter, 5.0V, 1.0A, USB-A Rect No Plugs	n/a	n/a	N	N
P2	330-00490-00	Conn, AC Plug Adapter	n/a	n/a	N	N
P3	320-00541-01	Cable, Assy, Mini B to A Style Mass Storage	n/a	n/a	N	N

All relevant accessories were evaluated for SAR on another product with a similar form factor reference report 454614444R1.0. Although the device is not intended to be used or transmit while attached to the users body; the device was tested using the worst case accessory type. See Section 10.0 for details

10.0 SAR MEASUREMENT SUMMARY

Table 10.0: Measured Results

Measured SAR Results (10g) - BODY(FCC/ISED)																
Date	Plot ID #	DUT Model	Test Type	DUT Type	Test Freq.	Modulation	Accessories				DUT Spacing		Meas. Cond. Power	Measured SAR	SAR Drift	
							Antenna ID	Battery ID	Body ID	Audio ID	DUT (mm)	Antenna (mm)				
					(MHz)		(dBm)	(W/kg)	(dB)							
Extremity SAR																
18 Oct 2018	B1	AA2670	Back Side	Hand-held Transceiver	27.045	CW	n/a	n/a	n/a	n/a	<5mm	30mm	28.71	0.295	0.540	
18 Oct 2018	B2	AA2670	Back Side	Hand-held Transceiver	27.045	CW	n/a	n/a	B1	n/a	<5mm	<5mm	28.71	0.065	-0.690	
19 Oct 2018	B3	AA2670	Front Side	Hand-held Transceiver	27.045	CW	n/a	n/a	n/a	n/a	<5mm	<5mm	28.71	0.024	1.750	
19 Oct 2018	B4	AA2670	Left Side	Hand-held Transceiver	27.045	CW	n/a	n/a	n/a	n/a	<5mm	<5mm	28.71	0.058	-1.090	
19 Oct 2018	B5	AA2670	Right Side	Hand-held Transceiver	27.045	CW	n/a	n/a	n/a	n/a	<5mm	<5mm	28.71	0.034	0.150	
19 Oct 2018	B6	AA2670	Bottom Side	Hand-held Transceiver	27.045	CW	n/a	n/a	n/a	n/a	<5mm	<5mm	28.71	0.007	0.510	
SAR Limit							Spatial Peak				RF Exposure Category					
FCC 47 CFR 2.1093				Health Canada Safety Code 6				Extremity	10g Average		4.0 W/kg		General Population			

See Section 8.0 for details

Note: This device is not intended to be used or transmit while placed in the user's pocket or within the user's apparel.

11.0 SCALING OF MAXIMUM MEASURED SAR

Table 11.0 SAR Scaling

Scaling of Maximum Measured SAR ⁽¹⁾							
Plot ID	Configuration	Freq	Measured Fluid Deviation		Measured Conducted Power	Measured Drift	Measured SAR (10g)
		(MHz)	Permittivity	Conductivity	(dBm)	(dB)	(W/kg)
B1	Extremity-Back Side	27.045	-8.55%	1.87%	28.7	0.540	0.295
Step 1							
Fluid Sensitivity Adjustment							
Plot ID	Scale Factor		X	Measured SAR		=	Step 1 Adjusted SAR (10g)
	(%)			(W/kg)			(W/kg)
B1	3.006%		X	0.295		=	0.304
Step 2							
Manufacturer's Tune-Up Tolerance							
Plot ID	Measured Conducted Power	Rated Power		Delta	Step 1 Adjusted SAR	=	Step 2 Adjusted SAR (10g)
	(dBm)	(dBm)		(dB)			(W/kg)
B1	28.7	28.7		0.0	0.304	=	0.304
Step 3 (ISED)							
Drift Adjustment							
Plot ID	Measured Drift	+	Step 2 Adjusted SAR		=	Step 3 Adjusted SAR (10g)	
	(dB)		(W/kg)			(W/kg)	
B1	0.540	+	0.304		=	0.304	
Step 4 (FCC)							
Simultaneous Transmission - Bluetooth and/or WiFi							
Plot ID	Rated Output Power (Pmax)	Freq	Separation Distance	Estimated SAR	Step 2 Adjusted SAR	=	Step 4 Adjusted SAR (10g)
	(mW)	(MHz)	(mm)	(W/kg)			(W/kg)
B1	n/a	n/a	0	n/a	0.304	=	0.304
Step 5							
Reported SAR							
Plot ID	FCC			ISED			
	From Steps 1, 2 and 4			From Steps 1 through 3			
	10g SAR (W/kg)			10g SAR (W/kg)			
B1	0.304			0.304			

*Fluid dielectric targets above and below 30MHz are not publish. Fluid deviation is based on the 30MHz target.

NOTES to Table 11.0	
<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. NOTE: Some of the scaling factors in Steps 1 through 5 may not apply and are identified by light gray text.</p>	
Step 1	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 (+).
Step 2	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.
Step 3	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.
Step 4	Per KDB 447498 4.3.2. The SAR, either measured or calculated, of ANY and ALL simultaneous transmitters must be added together and includes all contributors.
Step 5	Per RSS-102. The SAR, either measured or calculated, of ANY and ALL simultaneous transmitters must be added together and includes all contributors.
Step 6	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.

Table 11.1 Fluid Sensitivity Calculation (10g)

Fluid Sensitivity Calculation (10g)	
Delta SAR = Ce * Delta Er + C(sigma)*Delta Sigma	
Frequency (GHz)	Plot ID
0.027046	B1
Ce	-0.1839
Cσ	0.7664
Δ E	-8.5500
Δσ	1.8700
ΔSAR	3.0059
Scale Factor Is Positive. Scaling Required	

<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>	 Trevor Whillock Test Lab Engineer Celltech Labs Inc. 11 January 2019 Date
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12.0 SAR EXPOSURE LIMITS

Table 12.0 Exposure Limits

SAR RF EXPOSURE LIMITS			
FCC 47 CFR§2.1093	Health Canada Safety Code 6	General Population / Uncontrolled Exposure ⁽⁴⁾	Occupational / Controlled Exposure ⁽⁵⁾
Spatial Average ⁽¹⁾ (averaged over the whole body)		0.08 W/kg	0.4 W/kg
Spatial Peak ⁽²⁾ (Head and Trunk averaged over any 1 g of tissue)		1.6 W/kg	8.0 W/kg
Spatial Peak ⁽³⁾ (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.			

13.0 DETAILS OF SAR EVALUATION

13.0 Day Log

DAY LOG					Fluid Dielectric	SPC	Test
Date	Ambient Temp °C	Fluid Temp °C	Humidity	TSL			
17 Oct 2018	24	23.4	30%	150H	X	X	
18 Oct 2018	23	23.7	31%	150H			X
19 Oct 2018	24	24.0	31%	150H			X
19 Oct 2018	24	24.1	28%	150H	X		

* Testing exceeded 48hrs, additional measurement per IEEE 1528

13.1 DUT Setup and Configuration

DUT Setup and Configuration	
1	The DUT was evaluated for SAR in accordance with the procedures described in IEEE 1528, FCC KDB 865646 and 447498. The device was evaluated at a phantom separation distance of <5mm.
2	All relevant accessories were evaluated for SAR on another product with a similar form factor reference report 454614444R1.0. Although the device is not intended to be used or transmit while attached to the users body; the device was tested using the worst case accessory type.
3	The DUT was evaluated for SAR at the maximum conducted output power level, preset by the manufacturer. Each SAR evaluation was performed with a fully charged battery.

13.2 DUT Positioning

DUT Positioning	
Positioning	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.
FACE Configuration	This device is not intended to be held to the face and was not tested in the FACE configuration.
BODY/Extremity	The DUT was securely clamped into the device holder. The surfaces and edges of the DUT normally in contact with the body were placed in direct contact with the bottom of the phantom, or <5mm separation from the DUT's accessory to the phantom.
HEAD Configuration	This device is not intended to be held to the ear and was not tested in the HEAD configuration.

13.3 General Procedures and Report

General Procedures and Reporting	
General Procedures	<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 $\pm 0.5^{\circ}\text{C}$. The Active TSL temperature was maintained to within $\pm 2.0^{\circ}\text{C}$ 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 <u>Maximum Distance to Phantom Surface</u> to the fluid surface was performed following the power drift measurement.</p>
Reporting	<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>

13.4 Fluid Dielectric and Systems Performance Check

Fluid Dielectric and Systems Performance Check	
Fluid Dielectric Measurement Procedure	<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 $\pm 100\text{MHz}$ for frequencies $> 300\text{MHz}$ and $\pm 50\text{MHz}$ for frequencies $\leq 300\text{MHz}$ with frequency step size of 10MHz 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 23°C 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 $> 5\%$ in range that the DUT is to be tested. If the adjustments fail to bring the parameters to $\leq 5\%$ but are $< 10\%$, 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 $> 10\%$ in the DUT test frequency range are not used.</p>
Systems Performance Check	<p>The fluid dielectric parameters of the Active TSL are entered into the DASY Measurement Server at each of the 10MHz 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 10MHz 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 $\leq 10\%$ 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 $\pm 1^\circ\text{C}$ of the initial fluid analysis.</p>

13.5 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)	$4 \pm 1 \text{ mm}$
Maximum probe angle normal to phantom surface. (Flat Section ELI Phantom)	$5^\circ \pm 1^\circ$
Area Scan Spatial Resolution $\Delta X, \Delta Y$	15 mm
Zoom Scan Spatial Resolution $\Delta X, \Delta Y$	7.5 mm
Zoom Scan Spatial Resolution ΔZ (Uniform Grid)	5 mm
Zoom Scan Volume X, Y, Z	30 mm
Phantom	ELI
Fluid Depth	$150 \pm 5 \text{ mm}$
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	

13.6 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	

13.7 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	

14.0 MEASUREMENT UNCERTAINTIES

Table 14.0 Measurement Uncertainty

UNCERTAINTY BUDGET FOR DEVICE EVALUATION (IEEE 1528-2013 Table 9)									
Uncertainty Component	IEEE 1528 Section	Uncertainty Value ±%	Probability Distribution	Divisor	ci 1g	ci 10g	Uncertainty Value ±% (1g)	Uncertainty Value ±% (10g)	V _i or V _{eff}
Measurement System									
Probe Calibration*	E.2.1	6.6	Normal	1	1	1	6.60	6.60	∞
Axial Isotropy*	E.2.2	4.7	Rectangular	1.732050808	0.7	0.7	1.9	1.9	∞
Hemispherical Isotropy*	E.2.2	9.6	Rectangular	1.732050808	0.7	0.7	3.9	3.9	∞
Boundary Effect*	E.2.3	8.3	Rectangular	1.732050808	1	1	4.8	4.8	∞
Linearity*	E.2.4	4.7	Rectangular	1.732050808	1	1	2.7	2.7	∞
System Detection Limits*	E.2.4	1.0	Rectangular	1.732050808	1	1	0.6	0.6	∞
Modulation Response	E.2.5	4.0	Rectangular	1.732050808	1	1	2.3	2.3	∞
Readout Electronics*	E.2.6	1.0	Normal	1	1	1	1.0	1.0	∞
Response Time*	E.2.7	0.8	Rectangular	1.732050808	1	1	0.5	0.5	∞
Integration Time*	E.2.8	1.4	Rectangular	1.732050808	1	1	0.8	0.8	∞
RF Ambient Conditions - Noise	E.6.1	0.0	Rectangular	1.732050808	1	1	0.0	0.0	∞
RF Ambient Conditions - Reflection	E.6.1	0.0	Rectangular	1.732050808	1	1	0.0	0.0	∞
Probe Positioner Mechanical Tolerance*	E.6.2	0.4	Rectangular	1.732050808	1	1	0.2	0.2	∞
Probe Positioning wrt Phantom Shell*	E.6.3	2.9	Rectangular	1.732050808	1	1	1.7	1.7	∞
Extrapolation, interpolation & integration algorithms for max. SAR evaluation*	E.5	3.9	Rectangular	1.732050808	1	1	2.3	2.3	∞
Test Sample Related									
Test Sample Positioning	E.4.2	0.3	Normal	1	1	1	0.3	0.3	5
Device Holder Uncertainty*	E.4.1	3.6	Normal	1	1	1	3.6	3.6	∞
SAR Drift Measurement**	E.2.9	0.0	Rectangular	1.732050808	1	1	0.0	0.0	∞
SAR Scaling***	E.6.5	2.0	Rectangular	1.732050808	1	1	1.2	1.2	∞
Phantom and Tissue Parameters									
Phantom Uncertainty*	E.3.1	4.0	Rectangular	1.732050808	1	1	2.3	2.3	∞
SAR Correction Uncertainty	E.3.2	1.2	Normal	1	1	0.84	1.2	1.0	∞
Liquid Conductivity (measurement)	E.3.3	6.8	Normal	1	0.78	0.71	5.3	4.8	10
Liquid Permittivity (measurement)	E.3.3	5.3	Normal	1	0.23	0.26	1.2	1.4	10
Liquid Conductivity (Temperature)	E.3.2	0.1	Rectangular	1.732050808	0.78	0.71	0.1	0.0	∞
Liquid Permittivity Temperature)	E.3.2	0.0	Rectangular	1.732050808	0.23	0.26	0.0	0.0	∞
Effective Degrees of Freedom⁽¹⁾								V_{eff} =	873.2
Combined Standard Uncertainty			RSS				12.59	12.40	
Expanded Uncertainty (95% Confidence Interval)			k=2				25.18	24.80	

Measurement Uncertainty Table in accordance with IEEE Standard 1528-2003

(1) The Effective Degrees of Freedom is > 30 therefore a coverage factor of k=2 represents an approximate confidence level of 95%.

* Provided by SPEAG

Table 14.1 Calculation of Degrees of Freedom

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

15.0 FLUID DIELECTRIC PARAMETERS

Table 15.0 Fluid Dielectric Parameters 150MHz HEAD TSL

```

*****
                Aprel Laboratory
                Test Result for UIM Dielectric Parameter
                Wed 17/Oct/2018 10:37:55
                Freq   Frequency(GHz)
                FCC_eHFCC OET 65 Supplement C (June 2001) Limits for Head Epsilon
                FCC_sHFCC OET 65 Supplement C (June 2001) Limits for Head Sigma
                Test_e  Epsilon of UIM
                Test_s  Sigma of UIM
*****
                Freq           FCC_eHFCC_sH Test_e  Test_s
                0.0250         55.00  0.75   50.41  0.76
                0.0300         55.00  0.75   50.13  0.77
                0.0350         55.00  0.75   48.66  0.76
    
```

Fluid dielectric targets above and below 30MHz are not published. Deviation based on 30MHz target.

FLUID DIELECTRIC PARAMETERS								
Date:	17 Oct 2018	Fluid Temp:		23.4	Frequency:	150MHz	Tissue:	Head
Freq (MHz)	Test_e	Test_s	Target_e	Target_s	Deviation Permittivity	Deviation Conductivity		
25.0000		50.4100	0.7600	55.0000	0.75	-8.35%	1.33%	
27.0450	*	50.2980	0.7640	55.0000	0.75	-8.55%	1.87%	
30.0000		50.1300	0.7700	55.0000	0.75	-8.85%	2.67%	
35.0000		48.6600	0.7600	55.0000	0.75	-11.53%	1.33%	

*Channel Frequency Tested

Table 15.1 Fluid Dielectric Parameters 150MHz HEAD TSL

 Aprel Laboratory
 Test Result for UIM Dielectric Parameter
 Fri 19/Oct/2018 15:40:05
 Freq Frequency(GHz)
 FCC_eHFCC OET 65 Supplement C (June 2001) Limits for Head Epsilon
 FCC_sHFCC OET 65 Supplement C (June 2001) Limits for Head Sigma
 Test_e Epsilon of UIM
 Test_s Sigma of UIM

Freq	FCC_eHFCC_sH	Test_e	Test_s
0.0250	55.00	0.75	49.58
0.0300	55.00	0.75	50.38
0.0350	55.00	0.75	49.59

Fluid dielectric targets above and below 30MHz are not published. Deviation based on 30MHz target.
 *According to IEEE1528, when testing exceeds 48hrs, fluid parameters must be measured at the end of the test series.

FLUID DIELECTRIC PARAMETERS							
Date:	19 Oct 2018	Fluid Temp:	24.1	Frequency:	150MHz	Tissue:	Head
Freq (MHz)	Test_e	Test_s	Target_e	Target_s	Deviation Permittivity	Deviation Conductivity	
25.0000	49.5800	0.7500	55.0000	0.75	-9.85%	0.00%	
0	49.9000	0.7500	55.0000	0.75	-9.27%	0.00%	
30.0000	50.3800	0.7500	55.0000	0.75	-8.40%	0.00%	
35.0000	49.5900	0.7500	55.0000	0.75	-9.84%	0.00%	

*Channel Frequency Tested

16.0 SYSTEM VERIFICATION TEST RESULTS

Table 16.0 System Verification Results 30MHz HEAD TSL

System Verification Test Results					
Date		Frequency (MHz)	Validation Source		
			P/N	S/N	
17 Oct 2018		30	CLA-150		1005
Fluid Type	Fluid Temp °C	Ambient Temp °C	Ambient Humidity (%)	Forward Power (mW)	Source Spacing (mm)
Head	23.4	24	30%	1000	0
Fluid Parameters					
Permittivity			Conductivity		
Measured	Target	Deviation	Measured	Target	Deviation
50.13	55.00	8.85%	0.77	0.75	2.60%
Measured SAR					
1 gram			10 gram		
Measured	Target	Deviation	Measured	Target	Deviation
1.24	1.25	-0.80%	0.776	0.775	0.13%
Measured SAR Normalized to 1.0W					
1 gram			10 gram		
Normalized	Target	Deviation	Normalized	Target	Deviation
1.24	1.27	-2.36%	0.776	0.790	-1.77%
<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>					

17.0 SYSTEM VALIDATION SUMMARY

Table 17.0 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	24-Sep-18	EX3DV4	3600	CLA-30	1005	Head	50.15	0.72	Pass	Pass	Pass	
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	

18.0 MEASUREMENT SYSTEM SPECIFICATIONS

Table 18.0 Measurement System Specifications

Measurement System Specification	
Specifications	
Positioner	Stäubli Unimation Corp. Robot Model: TX90XL
Repeatability	+/- 0.035 mm
No. of axis	6.0
Data Acquisition Electronic (DAE) System	
Cell Controller	
Processor	Intel(R) Core(TM) i7-7700
Clock Speed	3.60 GHz
Operating System	Windows 10 Professional
Data Converter	
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
DASY Measurement Server	
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
E-Field Probe	
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)
Phantom	
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: ± 0.2 dB (30 MHz to 3 GHz)	
Directivity:	± 0.2 dB in head tissue (rotation around probe axis) ± 0.4 dB in head tissue (rotation normal to probe axis)	
Dynamic Range:	5 μ W/g to > 100 mW/g; Linearity: ± 0.2 dB	
Surface Detect:	± 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	
EX3DV4 E-Field Probe		
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>		
ELI Phantom		
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 65°. 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>		
Device Positioner		

19.0 TEST EQUIPMENT LIST

Table 19.0 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

20.0 FLUID COMPOSITION

Table 20.0 Fluid Composition 150MHz HEAD TSL

Tissue Simulating Liquid (TSL) Composition				
Component by Percent Weight				
Water	Sugar	Salt ⁽¹⁾	HEC ⁽²⁾	Bacteriacide ⁽³⁾
38.35	55.5	5.15	0.9	0.1

(1) Non-Iodized

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

(3) Dow Chemical Dowicil 75 Antimicrobial Preservative

Note: 150MHz HEAD TSL formulation was used during this evaluation.

APPENDIX A – SYSTEM VERIFICATION PLOTS

Date/Time: 10/17/2018 11:28:09 AM

Test Laboratory: Celltech Labs

SPC-30H Oct 17 2018

DUT: CLA-30; Type: CLA-30; Serial: 1005

Communication System: UID 0, CW (0); Communication System Band: FullSpan (0.0 - 6000.0 MHz); Frequency: 30 MHz; Communication System PAR: 0 dB; PMF: 1

Medium: TSL_150H[17OCT18]

Medium parameters used: $f = 30$ MHz; $\sigma = 0.77$ S/m; $\epsilon_r = 50.13$; $\rho = 1000$ kg/m³

Phantom section: Flat Section

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

DASY Configuration:

- Probe: EX3DV4 - SN3600 --add ConvF; ConvF(12.17, 12.17, 12.17); Calibrated: 11/23/2017, ConvF(12.17, 12.17, 12.17); Calibrated: 11/23/2017, ConvF(12.17, 12.17, 12.17); Calibrated: 11/23/2017;
 - Modulation Compensation:
- Sensor-Surface: 4mm (Mechanical Surface Detection), $z = 16.0, 31.0, 151.0$
- 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: 30 MHz

SPC 150H/SPC 150H Input=1.0W, Target=1.25W/kg/Area Scan (8x9x1): Measurement grid: dx=15mm, dy=15mm

Maximum value of SAR (measured) = 1.15 W/kg

SPC 150H/SPC 150H Input=1.0W, Target=1.25W/kg/Zoom Scan (5x5x7)/Cube 0: Measurement grid: dx=7.5mm, dy=7.5mm, dz=5mm

Reference Value = 41.60 V/m; Power Drift = 0.00 dB

Peak SAR (extrapolated) = 2.00 W/kg

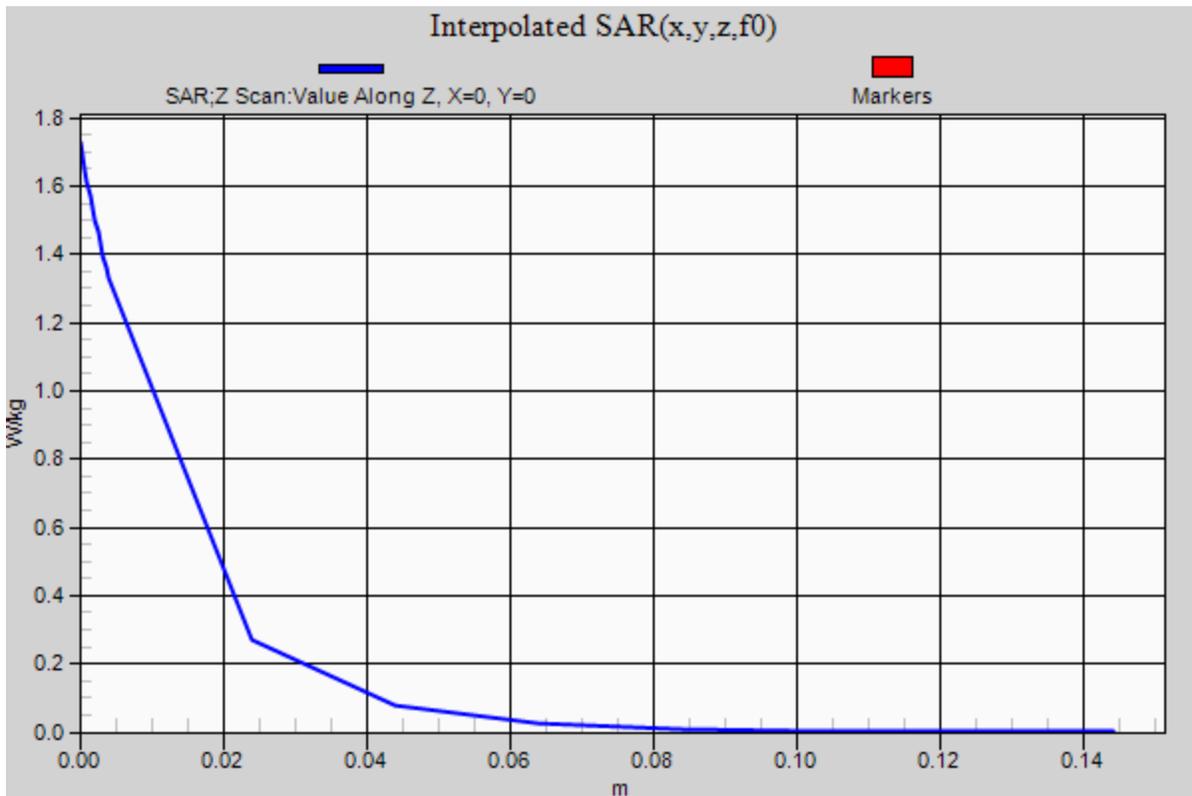
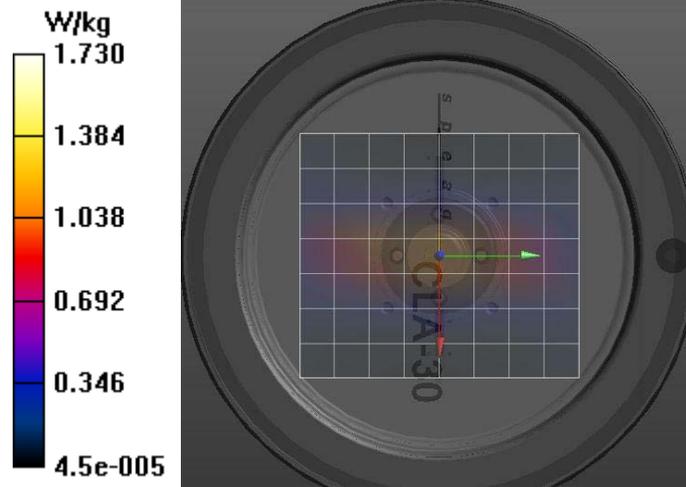
SAR(1 g) = 1.24 W/kg; SAR(10 g) = 0.776 W/kg

Maximum value of SAR (measured) = 1.33 W/kg

SPC 150H/SPC 150H Input=1.0W, Target=1.25W/kg/Z Scan (1x1x19): Measurement grid: dx=20mm, dy=20mm, dz=20mm

Penetration depth = n/a (n/a, 12.55) [mm]

Maximum value of SAR (interpolated) = 1.73 W/kg



APPENDIX B – MEASUREMENT PLOTS OF MAXIMUM MEASURED SAR

Plot B1

Date/Time: 10/18/2018 2:24:28 PM,

Test Laboratory: Celltech Labs

Garmin AA2670 150H Oct 18 2018

DUT: Garmin AA2670; Type: Sample; Serial: IMEI Number

Communication System: UID 0, CW(0); Communication System Band: CW; Frequency: 27 MHz; Communication System PAR: 0 dB; PMF: 1

Medium: TSL_150H[17Oct18]

Medium parameters used (interpolated): $f = 27$ MHz; $\sigma = 0.764$ S/m; $\epsilon_r = 50.298$; $\rho = 1000$ kg/m³

Phantom section: Flat Section

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

DASY Configuration:

- Probe: EX3DV4 - SN3600 --add ConvF; ConvF(12.17, 12.17, 12.17); Calibrated: 11/23/2017, ConvF(12.17, 12.17, 12.17); Calibrated: 11/23/2017, ConvF(12.17, 12.17, 12.17); Calibrated: 11/23/2017;
 - Modulation Compensation:
- 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: MHz

150H/B1-AA2670, Body Config Back Side, 27.045MHz/Area Scan (7x14x1): Measurement grid: dx=15mm, dy=15mm

[Info: Interpolated medium parameters used for SAR evaluation.](#)

Maximum value of SAR (measured) = 0.496 W/kg

150H/B1-AA2670, Body Config Back Side, 27.045MHz/Zoom Scan (5x5x7)/Cube 0: Measurement grid: dx=7.5mm, dy=7.5mm, dz=5mm

Reference Value = 15.10 V/m; Power Drift = 0.54 dB

Peak SAR (extrapolated) = 1.11 W/kg

SAR(1 g) = 0.551 W/kg; SAR(10 g) = 0.295 W/kg

[Info: Interpolated medium parameters used for SAR evaluation.](#)

Maximum value of SAR (measured) = 0.589 W/kg

150H/B1-AA2670, Body Config Back Side, 27.045MHz/Z Scan (1x1x19): Measurement grid: dx=20mm, dy=20mm, dz=20mm

[Info: Interpolated medium parameters used for SAR evaluation.](#)

Penetration depth = n/a (n/a, 11.57) [mm]

Maximum value of SAR (interpolated) = 0.260 W/kg

