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16-Feb-26

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Subject: SUBTEL, Chile (Resolution 737) Certification Compliance 2026

Commercial Name: GPSMAP 86i

	Información (Information)
Tipo de equipo (Equipment type)	Digital Transmission System
Marca (Brand)	Garmin 
Modelo (Model)	AA3556
Tecnología o modulación (Technology or modulation)	BTBR (GFSK), BLE (GMSK), ANT (GFSK), WiFi 2.4GHz (802.11 b/g/n)
Frecuencias (Frequencies)	BTBR (2402MHz- 2480MHz), BLE (2402MHz- 2480MHz), ANT (2402MHz- 2480MHz), WiFi 2.4GHz (2412MHz – 2462MHz)
Ganancia de antena (dBi) (Antenna gain (dBi))	BTBR Trace (-4.0 dBi), BLE Trace (-4.0 dBi), ANT Trace (-4.0 dBi), WiFi 2.4GHz Trace (-4.0 dBi)
P.i.r.e. (E.I R P.)	BTBR (-1.756 dBm, 0.667 mW), BLE (-1.762 dBm, 0.666 mW), ANT (-1.706 dBm, 0.675 mW), WiFi 2.4GHz (17.51 dBm, 56.36 mW)
Módulos (Modules)	BTBR, BLE, ANT, WiFi 2.4GHz

Declaration of Conformity Statement: the equipment previously identified complies with the provisions established in the Technical Standard for Small Range Equipment, approved by Exempt Resolution No.1,985 of 2017, of the Undersecretary of Telecommunications.

Declaración de conformidad: El equipo anteriormente identificado cumple con las disposiciones establecidas en la Norma Técnica para Equipos de Corto Alcance, aprobada mediante la Resolución Exenta N° 1.985 de 2017, de la Subsecretaría de Telecomunicaciones.

FCC/ISED Test Report

Prepared for: Garmin International Inc.

Address: 1200 E. 151st Street
Olathe, Kansas, 66062, USA

Product: AA3556

Test Report No: R20190123-20-05A

Approved By:


Nic S. Johnson, NCE

Technical Manager
iNARTE Certified EMC Engineer #EMC-003337-NE

DATE: 13 August 2019

Total Pages: 82

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REVISION PAGE

Rev. No.	Date	Description
0	28 June 2019	Original – NJohnson Prepared by KVepuri/CFarrington
A	13 August 2019	Includes NCEE Labs report R20190123-20-05 and its amendment in full -NJ

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1.0 SUMMARY OF TEST RESULTS

The worst-case measurements were reported in this report. The EUT has been tested according to the following specifications:

APPLIED STANDARDS AND REGULATIONS		
Standard Section	Test Type	Result
FCC Part 15.35 RSS Gen, Issue 4, Section 6.10	Duty Cycle	N/A
FCC Part 15.247(a)(1) RSS-247 Issue 2 Section 5.2	Peak output power	Pass
FCC Part 15.247(a)(1) RSS-247 Issue 2 Section 5.2	Bandwidth	Pass
FCC Part 15.209 RSS-Gen Issue 4, Section 7.1	Receiver Radiated Emissions	Pass
FCC Part 15.209 (restricted bands), 15.247 (unrestricted) RSS-247 Issue 2 Section 5.5, RSS-Gen Issue 4, Section 8.9	Transmitter Radiated Emissions	Pass
FCC Part 15.247(a)(1) RSS-247 Issue 2 Section 5.2	Power Spectral Density	Pass
FCC Part 15.209, 15.247(d) RSS-247 Issue 2 Section 11.13	Band Edge Measurement	Pass
FCC Part 15.207 RSS-Gen Issue 4, Section 7.1	Conducted Emissions	Pass

See Section 4 for details on the test methods used for each test.

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2.0 EUT DESCRIPTION

2.1 EQUIPMENT UNDER TEST

The Equipment Under Test (EUT) was a portable battery powered transceiver from Garmin. It features 802.11b, 802.11g, 802.11n, GFSK and GMSK modules and has transmit and receives capabilities.

EUT	Portable transceiver
Model	AA3556
EUT Received	10 June 2019
EUT Tested	11 June 2019- 26 June 2019
Serial No.	3994474026 (used for radiated tests); 3994474016 (used for conducted tests)
Operating Band	2400.0 - 2483.5 GHz
Device Type	802.11b, 802.11g, 802.11n
Antenna	Trace Antenna
Power Supply	Internal Battery/ Charger: Garmin (Phi Hong) MN: PSAI10R-050Q

NOTE: For more detailed features description, please refer to the manufacturer's specifications or user's manual.

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2.2 DESCRIPTION OF TEST MODES

The EUT operates on, and was tested at the frequencies below:

Channel	Frequency
Low (Channel 1)	2412
Middle (Channel 6)	2437
High (Channel 11)	2462

As well as the following modes:

WIFI Mode
802.11b
802.11g
802.11n

These are the only three representative channels tested in the frequency range according to FCC Part 15.31 and RSS-Gen Table A1. See the operational description for a list of all channel frequency and designations.

This EUT was set to transmit in a worse-case scenario with modulation on. The manufacturer modified the unit to transmit continuously on the lowest, highest and one channel in the middle.

2.3 DESCRIPTION OF SUPPORT UNITS

NA

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3.0 LABORATORY DESCRIPTION

3.1 LABORATORY DESCRIPTION

All testing was performed at the following Facility:

The Nebraska Center for Excellence in Electronics (NCEE Labs)
 4740 Discovery Drive
 Lincoln, NE 68521

A2LA Certificate Number:	1953.01
FCC Accredited Test Site Designation No:	US1060
Industry Canada Test Site Registration No:	4294A-1
NCC CAB Identification No:	US0177

Environmental conditions varied slightly throughout the tests:

Relative humidity of $35 \pm 4\%$
 Temperature of $22 \pm 3^{\circ}$ Celsius

3.2 TEST PERSONNEL

All testing was performed by Karthik Vepuri and Caleb Farrington of NCEE Labs. The results were reviewed by Nic Johnson.

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3.3 TEST EQUIPMENT

DESCRIPTION AND MANUFACTURER	MODEL NO.	SERIAL NO.	LAST CALIBRATION DATE	CALIBRATION DUE DATE
Rohde & Schwarz Test Receiver	ES126	100037	30 Jan 2018	30 Jan 2020
Keysight EXA Signal Analyzer	N9010A	MY56070862	14 Dec 2018	14 Dec 2020
EMCO Biconilog Antenna	3142B	1647	02 Aug 2017	02 Aug 2019
EMCO Horn Antenna	3115	6416	26 Jan 2018	26 Jan 2020
EMCO Horn Antenna	3116	2576	31 Jan 2018	31 Jan 2020
Rohde & Schwarz Preamplifier	TS-PR18	3545700803	09 Mar 2018*	09 Mar 2020*
Trilithic High Pass Filter	6HC330	23042	09 Mar 2018*	09 Mar 2020*
RF Cable (preamplifier to antenna)	MFR-57500	01-07-002	09 Mar 2018*	09 Mar 2020*
RF Cable (antenna to 10m chamber bulkhead)	FSCM 64639	01E3872	09 Mar 2018*	09 Mar 2020*
RF Cable (10m chamber bulkhead to control room bulkhead)	FSCM 64639	01E3874	09 Mar 2018*	09 Mar 2020*
RF Cable (Control room bulkhead to RF switch)	FSCM 64639	01E3871	09 Mar 2018*	09 Mar 2020*
RF Cable (RF switch to test receiver)	FSCM 64639	01F1206	09 Mar 2018*	09 Mar 2020*
RF switch – Rohde and Schwarz	TS-RSP	1113.5503.14	09 Mar 2018*	09 Mar 2020*
N connector bulkhead (10m chamber)	PE9128	NCEEBH1	09 Mar 2018*	09 Mar 2020*
N connector bulkhead (control room)	PE9128	NCEEBH2	09 Mar 2018*	09 Mar 2020*
Rohde & Schwarz power meter	NRVD	036029/012	07 Aug 2018	07 Aug 2019
Rohde & Schwarz power sensor	URV5-Z2	836416/022	07 Aug 2018	07 Aug 2019

*Internal Characterization

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4.0 DETAILED RESULTS

4.1 DUTY CYCLE

Duty Cycle measurements were not conducted as the EUT is capable of continuous transmission.

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4.2 RADIATED EMISSIONS

Test Method: ANSI C63.10:2013:

1. Section 6.5, "Radiated emissions from unlicensed wireless devices in the frequency range of 30 MHz to 1000 MHz"
2. Section 6.6, "Radiated emissions from unlicensed wireless devices above 1 GHz"
3. Section 11.11, "Measurement in non-restricted frequency bands"
4. Section 11.12, "Emissions in restricted bands"

Limits for radiated emissions measurements:

Emissions radiated outside of the specified bands shall be applied to the limits in 15.209 as followed:

FREQUENCIES (MHz)	FIELD STRENGTH (μV/m)	MEASUREMENT DISTANCE (m)
0.009-0.490	2400/F(kHz)	300
0.490-1.705	24000/F(kHz)	30
1.705-30.0	30	3
30-88	100	3
88-216	150	3
216-960	200	3
Above 960	500	3

Note about requirement from FCC Part 15.247(d) and RSS-247, Section 5.5:

In addition to the limits shown above, all emissions were also required to be at least 20 dB below that in the 100 kHz bandwidth within the band that contains the highest level of the desired power. All measurements were performed with a 1 MHz bandwidth, but the bandwidth conversion from 1 MHz to 100 kHz would be equally applied to the highest emission and the spurious emissions, so it would not affect the delta measurement.

Since the fundamental emissions was at least 20 dB over the spurious emissions limits from 15.209 and all spurious emissions were below the 15.209 limit, this requirement was met.

NOTE:

1. The lower limit shall apply at the transition frequencies.
2. Emission level (dBμV/m) = 20 * log * Emission level (μV/m).
3. As shown in 15.35(b), for frequencies above 1000MHz, the field strength limits are based on average detector, however, the peak field strength of any emission shall not exceed the maximum permitted average limits by more than 20dB under any condition of modulation.

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Test procedures:

- a. The EUT was placed on the top of a rotating table above the ground plane in a 10 meter semi-anechoic chamber. The table was rotated 360 degrees to determine the position of the highest radiation. The table was 0.8m high for measurements from 30MHz-1GHz and 1.5m for measurements from 1GHz and higher.
- b. The EUT was set 3 meters away from the interference-receiving antenna, which was mounted on the top of a variable-height antenna tower.
- c. The antenna was a broadband antenna, and its height is varied from one meter to four meters above the ground to determine the maximum value of the field strength. Both horizontal and vertical polarizations of the antenna are used to make the measurement.
- d. For each suspected emission, the EUT was arranged to maximize its emissions and then the antenna height was varied from 1 meter to 4 meters and the rotating table was turned from 0 degrees to 360 degrees to find the maximum emission reading.
- e. The test-receiver system was set to use a peak detector with a specified resolution bandwidth. For spectrum analyzer measurements, the composite maximum of several analyzer sweeps was used for final measurements.
- f. If the emission level of the EUT in peak mode was 10dB lower than the limit specified, then testing could be stopped and the peak values of the EUT would be reported. Otherwise the emissions that did not have 10 dB margin would be re-tested one by one using peak, quasi-peak or average method as specified and then reported in a data sheet.
- g. All 802.11 modes were examined (b, g, n, HT20) and it was found the 802.11n mode produced the highest emissions. All final measurements were performed with the EUT transmitting continuously in this mode.

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NOTE:

1. The resolution bandwidth and video bandwidth of test receiver/spectrum analyzer is 120kHz for Peak detection (PK) and Quasi-peak detection (QP) at frequencies below 1GHz.
2. The resolution bandwidth 1 MHz for all measurements and at frequencies above 1GHz, A peak detector was used for all measurements above 1GHz. Measurements were made with an EMI Receiver.

Deviations from test standard:

No deviation.

Test setup:

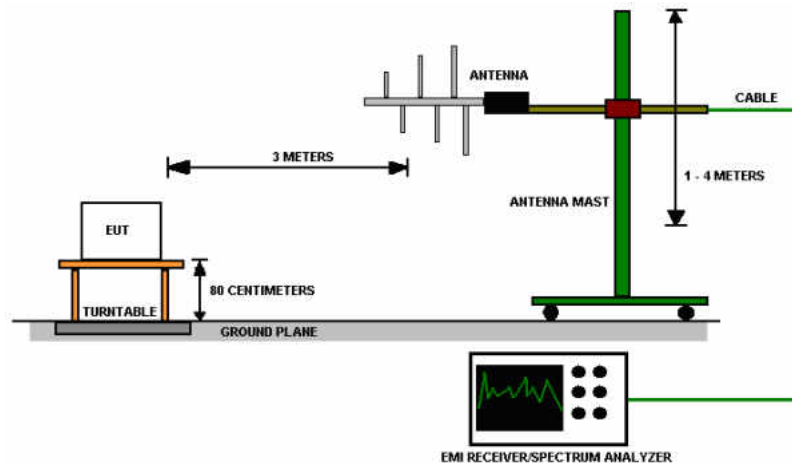


Figure 1 - Radiated Emissions Test Setup

EUT operating conditions

The EUT was powered by internal battery power unless specified and set to transmit continuously on the lowest frequency channel, highest frequency channel and one in the middle of its operating range. EUT was set to transmit in 80211b, 80211g and 80211n.

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Test results:

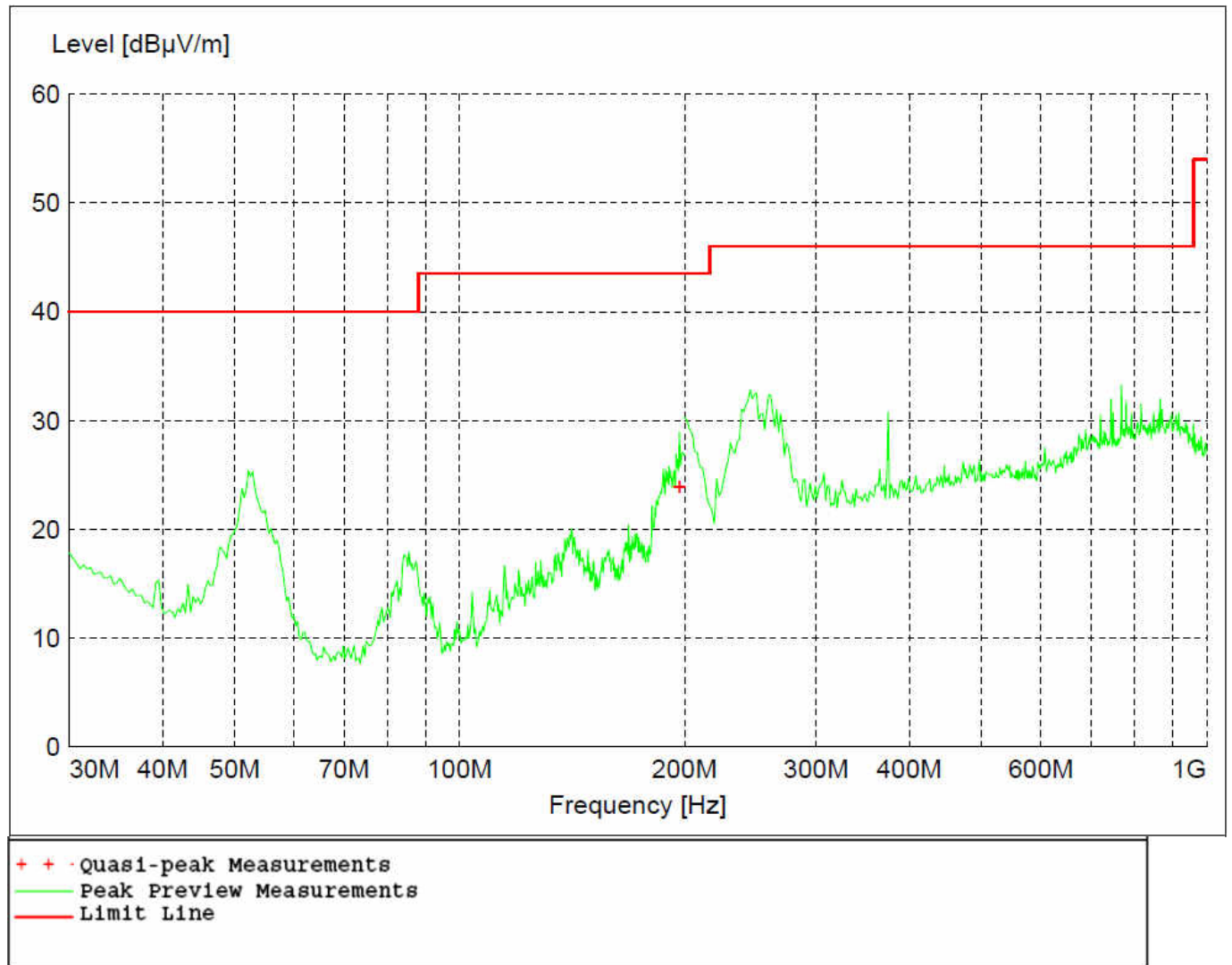


Figure 2 - Radiated Emissions Plot, Receive

Table 1 - Radiated Emissions Quasi-peak and Peak Measurements, Receive, 802.11b

Frequency	Level	Limit	Margin	Height	Angle	Pol
MHz	dBµV/m	dBµV/m	dB	cm.	deg.	
197.040000	23.97	43.50	19.50	143	358	HORI

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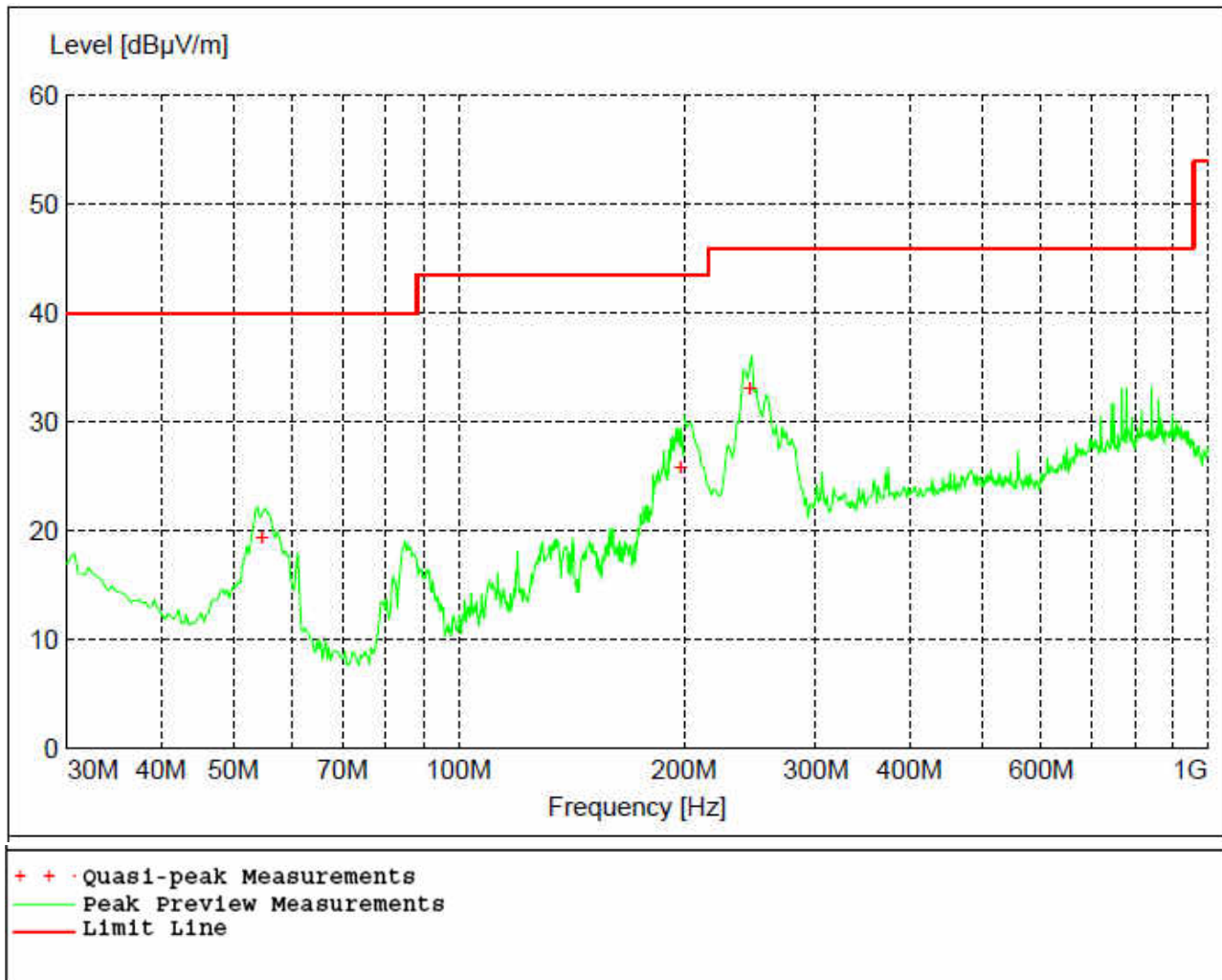


Figure 3 - Radiated Emissions Plot, 802.11b

Table 2 - Radiated Emissions Quasi-peak Measurements, 802.11b

Frequency	Level	Limit	Margin	Height	Angle	Pol
MHz	dBμV/m	dBμV/m	dB	cm.	deg.	
54.720000	19.27	40.00	20.70	98	244	VERT
198.000000	25.72	43.50	17.80	134	353	HORI
245.160000	33.06	46.00	12.90	143	231	HORI

All modulations were measured for receive mode and 802.11b was found to produce the highest emissions, although all odes were similar within 2 dB.

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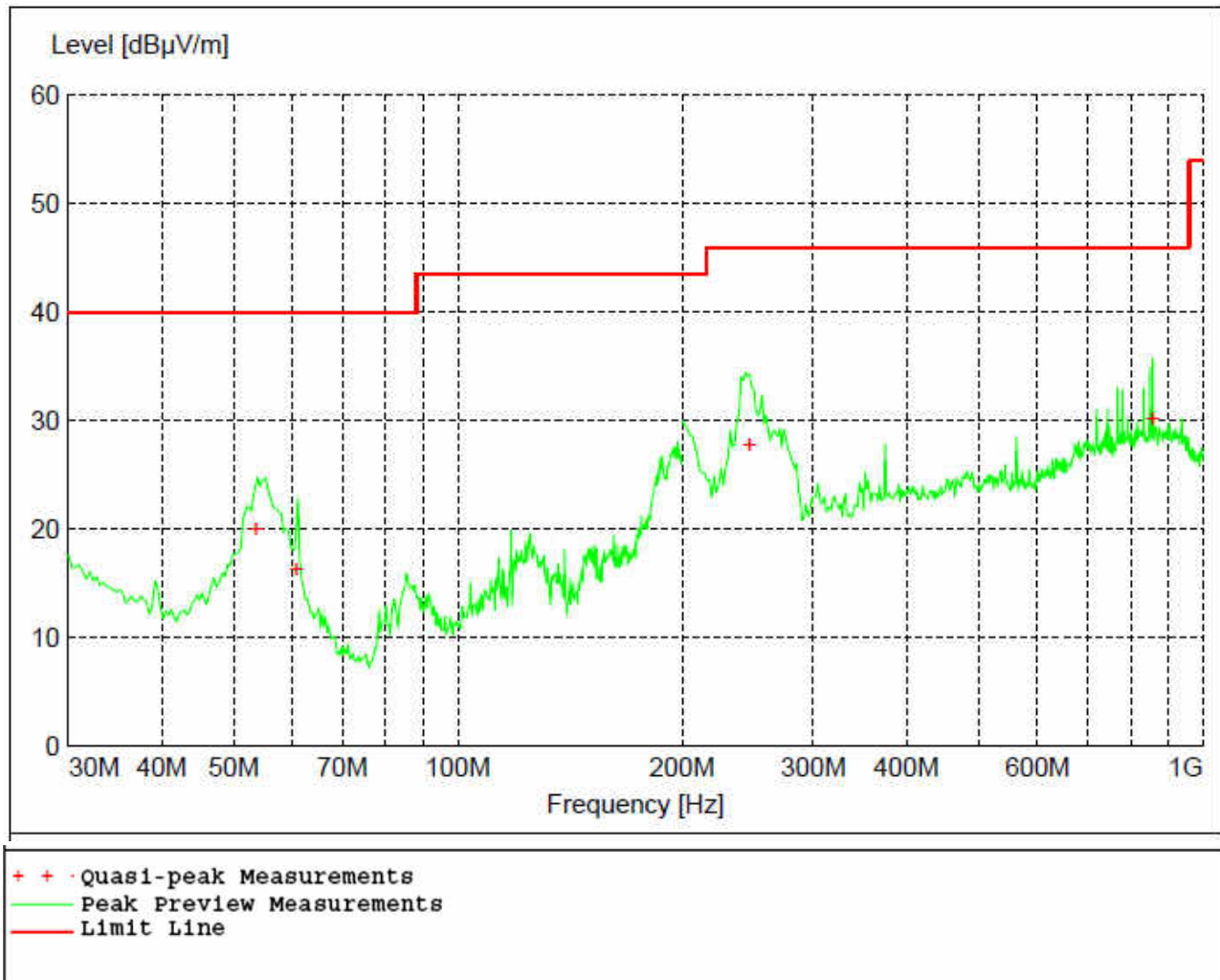


Figure 4 - Radiated Emissions Plot, 802.11g

Table 3 - Radiated Emissions Quasi-peak Measurements, 802.11g

Frequency	Level	Limit	Margin	Height	Angle	Pol
MHz	dBμV/m	dBμV/m	dB	cm.	deg.	
53.580000	19.96	40.00	20.00	99	285	VERT
60.720000	16.21	40.00	23.80	112	127	VERT
246.300000	27.69	46.00	18.30	137	70	HORI
857.160000	30.19	46.00	15.80	102	0	HORI

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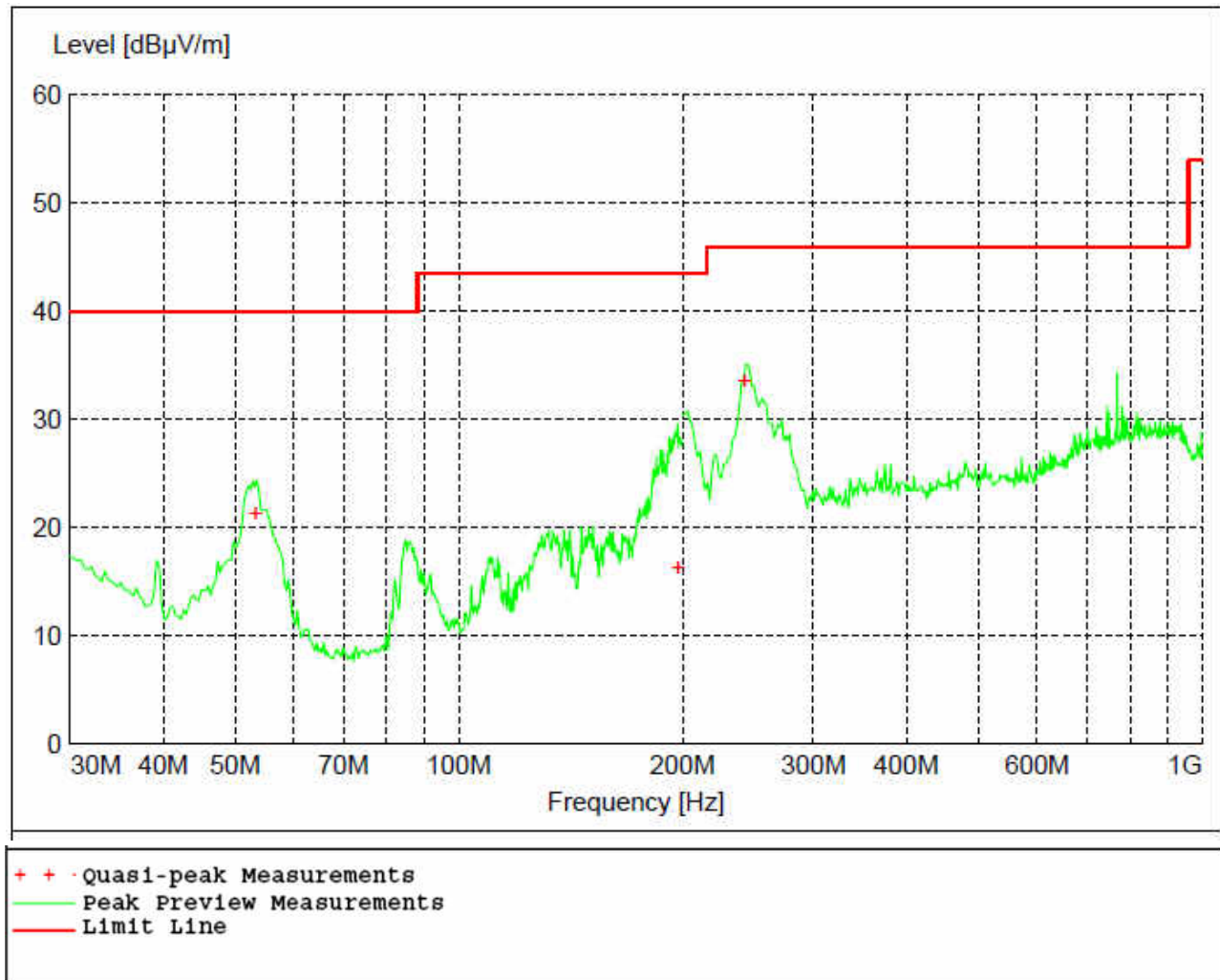


Figure 5 - Radiated Emissions Plot, 802.11n

Table 4 - Radiated Emissions Quasi-peak Measurements, 802.11n

Frequency	Level	Limit	Margin	Height	Angle	Pol
MHz	dBμV/m	dBμV/m	dB	cm.	deg.	
53.280000	21.21	40.00	18.80	100	235	VERT
197.280000	16.23	43.50	27.30	123	0	HORI
242.520000	33.48	46.00	12.50	129	222	HORI

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Table 5 - Radiated Emissions Average Measurements

Frequency	Level	Limit	Margin	Height	Angle	Pol	Modulation
MHz	dB μ V/m	dB μ V/m	dB	cm.	deg.		
2412.000000	91.20	NA	NA	117	158	HORI	802.11 b
2462.000000	90.16	NA	NA	170	314	VERT	802.11 b
9648.000000	50.59	54.00	3.41	133	226	HORI	802.11 b
2412.000000	84.40	NA	NA	119	165	HORI	802.11 g
2462.000000	93.47	NA	NA	200	313	VERT	802.11 g
2412.000000	80.69	NA	NA	201	63	VERT	802.11 n
2437.000000	83.78	NA	NA	200	46	HORI	802.11 n
2462.000000	80.83	NA	NA	99	166	HORI	802.11 n

Table 6 - Radiated Emissions Peak Measurements

Frequency	Level	Limit	Margin	Height	Angle	Pol	Modulation
MHz	dB μ V/m	dB μ V/m	dB	cm.	deg.		
2412.000000	100.68	NA	NA	117	158	HORI	802.11 b
2462.000000	99.90	NA	NA	170	314	VERT	802.11 b
9648.000000	54.35	74.00	19.65	133	226	HORI	802.11 b
2412.000000	99.11	NA	NA	119	165	HORI	802.11 g
2462.000000	97.76	NA	NA	200	313	VERT	802.11 g
2412.000000	97.21	NA	NA	201	63	VERT	802.11 n
2437.000000	100.03	NA	NA	200	46	HORI	802.11 n
2462.000000	98.03	NA	NA	99	166	HORI	802.11 n

REMARKS:

1. Emission level (dB μ V/m) = Raw Value (dB μ V) + Correction Factor (dB)
2. Correction Factor (dB/m) = Antenna Factor (dB/m) + Cable Factor (dB)
3. The other emission levels were very low against the limit.
4. Margin value = Emission level – Limit value.
5. All 3 possible 802.11 modes were tested. The highest of each is presented in the tables.

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4.3 OUTPUT POWER

Test Method: ANSI C63.10:
1. Section(s) 11.9.2.2.6

Limits of power measurements:
The maximum allowed peak output power is 30 dBm.

Test procedures:
The EUT was connected to a spectrum analyzer directly with a low-loss shielded coaxial cable with 100 MHz RBW and 300 MHz VBW. Power was determined using integrated power measurement. The intention was to verify that the measurement results were the same as the original filing for this device within the measurement uncertainty of the laboratory.

Deviations from test standard:
No deviation.

Test setup:

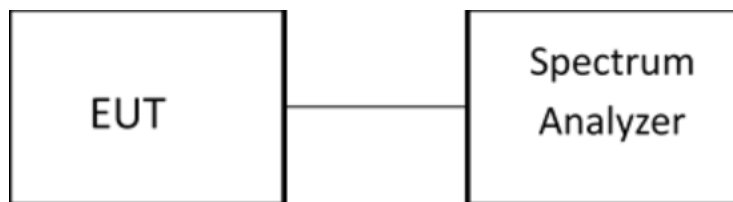


Figure 6 – Peak Output Power Measurements Test Setup

EUT operating conditions:
The EUT was powered by internal battery power unless specified and set to transmit continuously on the lowest frequency channel, highest frequency channel and one in the middle of its operating range.

Test results:
The uncertainty for conducted peak power measurements is ± 1.1 dB and average power is ± 1.37 dB

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Peak Output Power

CHANNEL	CHANNEL FREQUENCY (MHz)	WIFI Type	PEAK OUTPUT POWER (dBm) MU = ± 1.1 dB	Method	RESULT
Low	2412	802.11b	21.15	Conducted	PASS
Middle	2437	802.11b	21.22	Conducted	PASS
High	2462	802.11b	21.51	Conducted	PASS
Low	2412	802.11g	17.79	Conducted	PASS
Middle	2437	802.11g	19.91	Conducted	PASS
High	2462	802.11g	18.45	Conducted	PASS
Low	2412	802.11n	17.78	Conducted	PASS
Middle	2437	802.11n	20.05	Conducted	PASS
High	2462	802.11n	18.31	Conducted	PASS

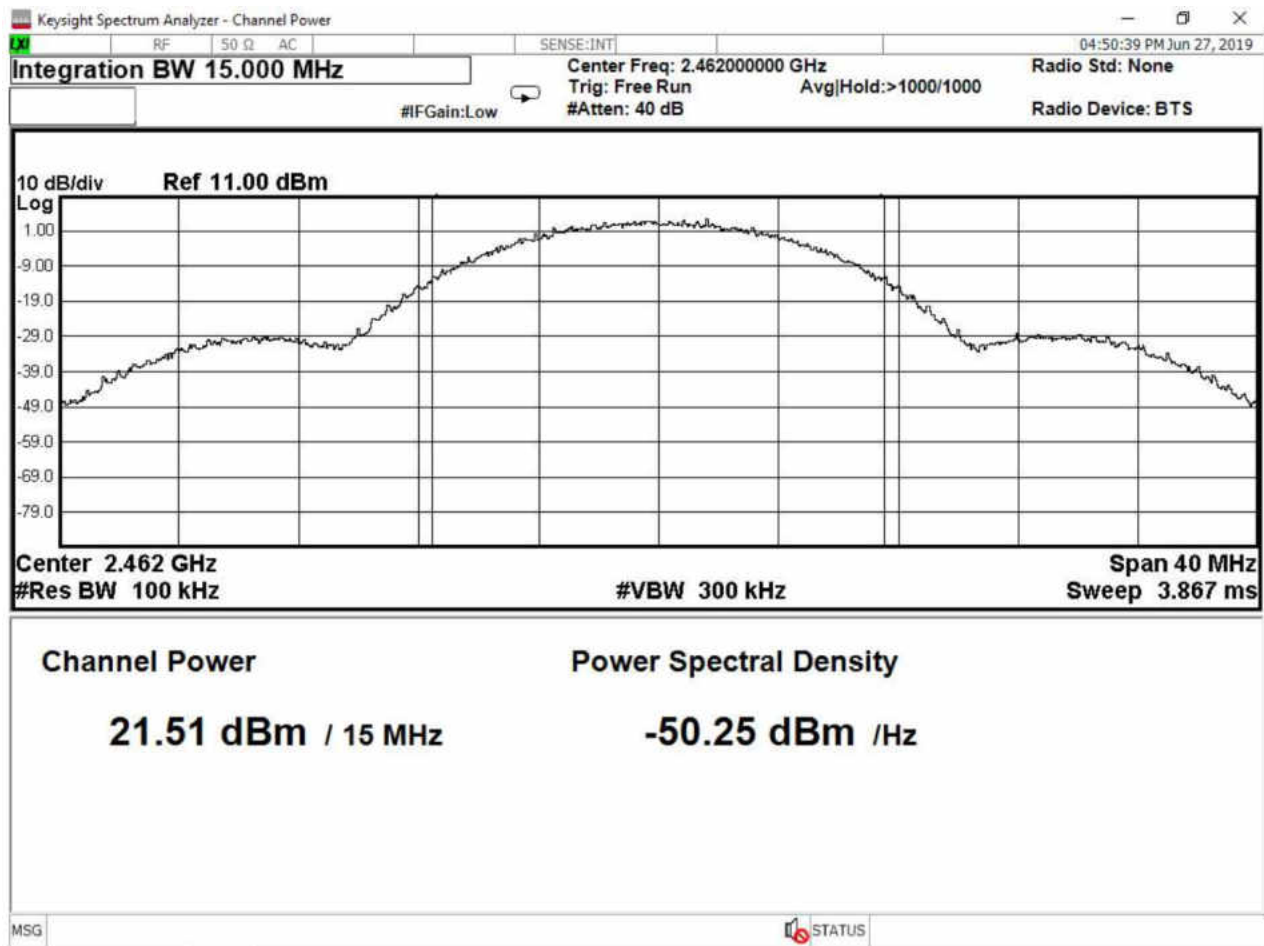
Average Output Power

CHANNEL	CHANNEL FREQUENCY (MHz)	WIFI Type	Average OUTPUT POWER (dBm) MU = ± 1.37	Method	RESULT
Low	2412	802.11b	19.62	Conducted	PASS
Middle	2437	802.11b	19.39	Conducted	PASS
High	2462	802.11b	19.58	Conducted	PASS
Low	2412	802.11g	16.87	Conducted	PASS
Middle	2437	802.11g	18.03	Conducted	PASS
High	2462	802.11g	16.58	Conducted	PASS
Low	2412	802.11n	15.64	Conducted	PASS
Middle	2437	802.11n	18.07	Conducted	PASS
High	2462	802.11n	16.28	Conducted	PASS

All measurements include 0.1 dB of cable loss.

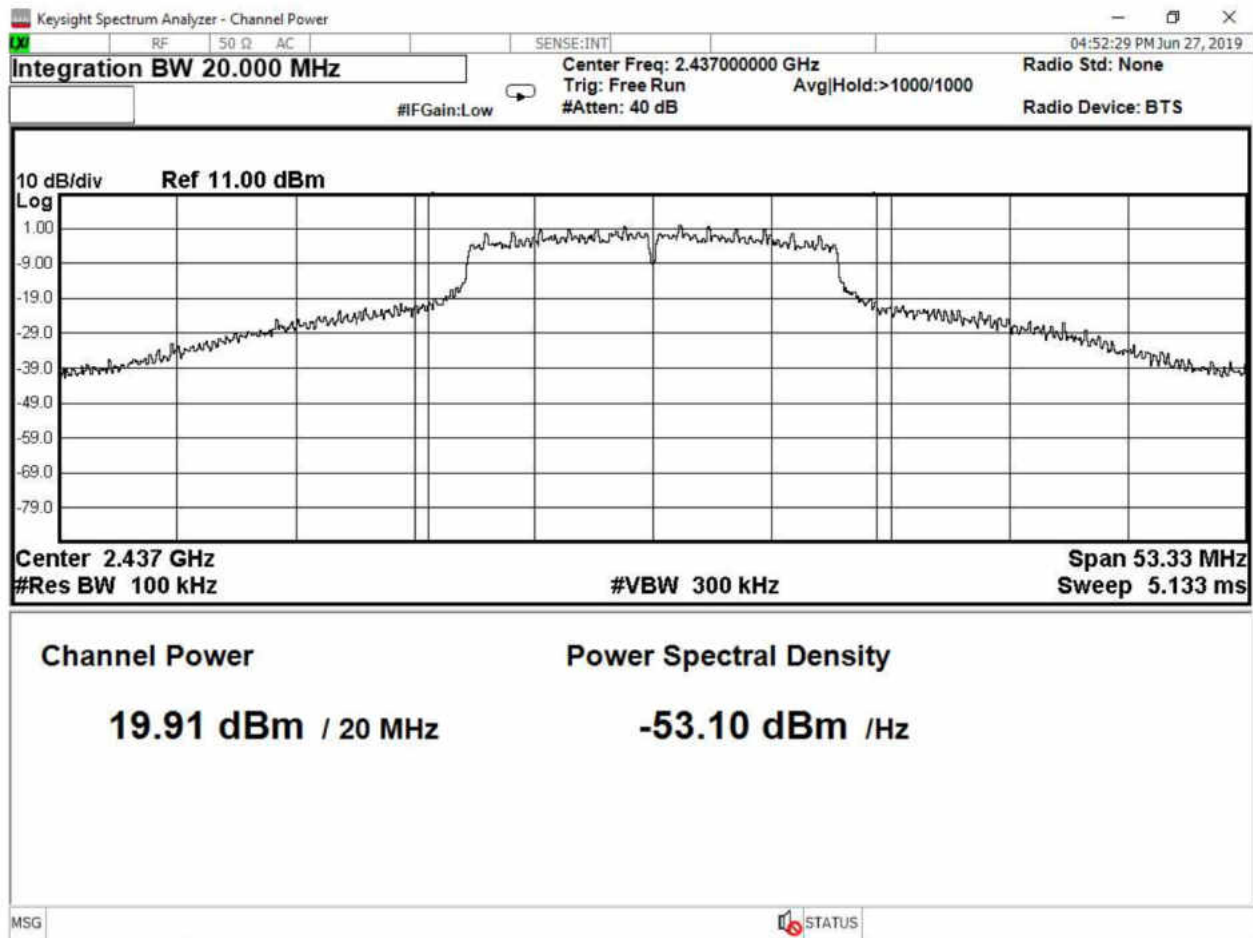
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Peak Output Power Plots, 802.11b, highest channel



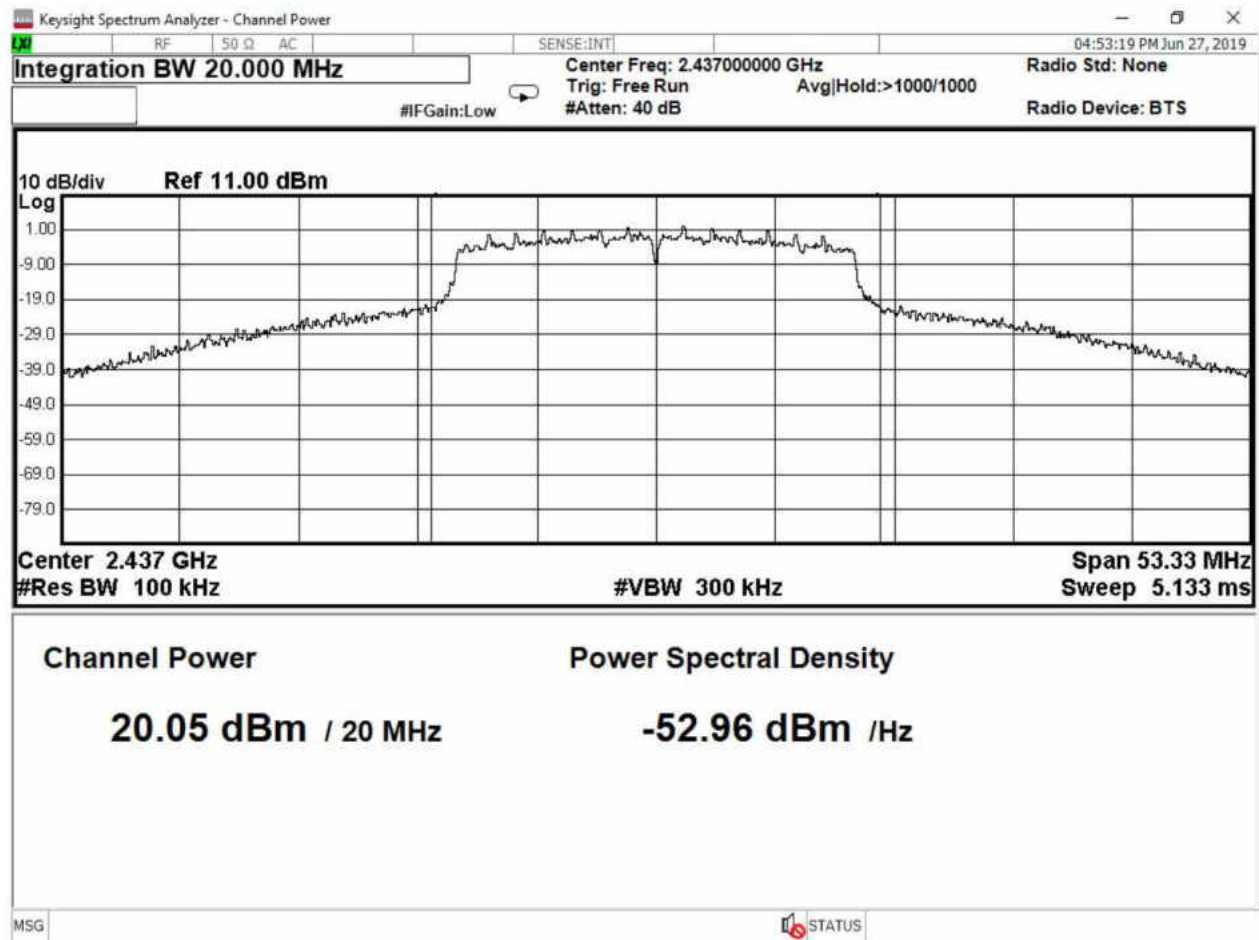
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Peak Output Power Plots, 802.11g, middle channel



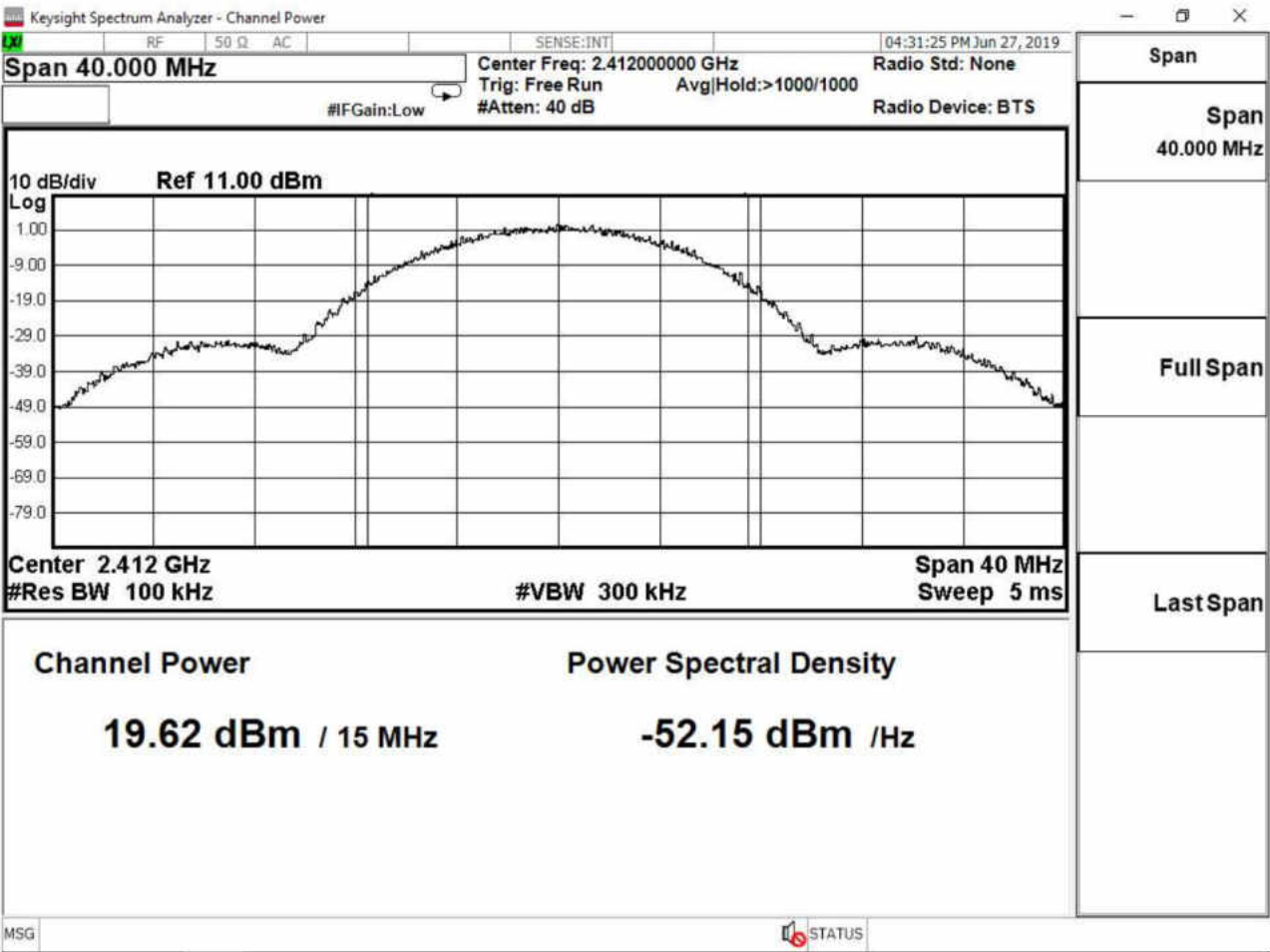
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Peak Output Power Plots, 802.11n, middle channel



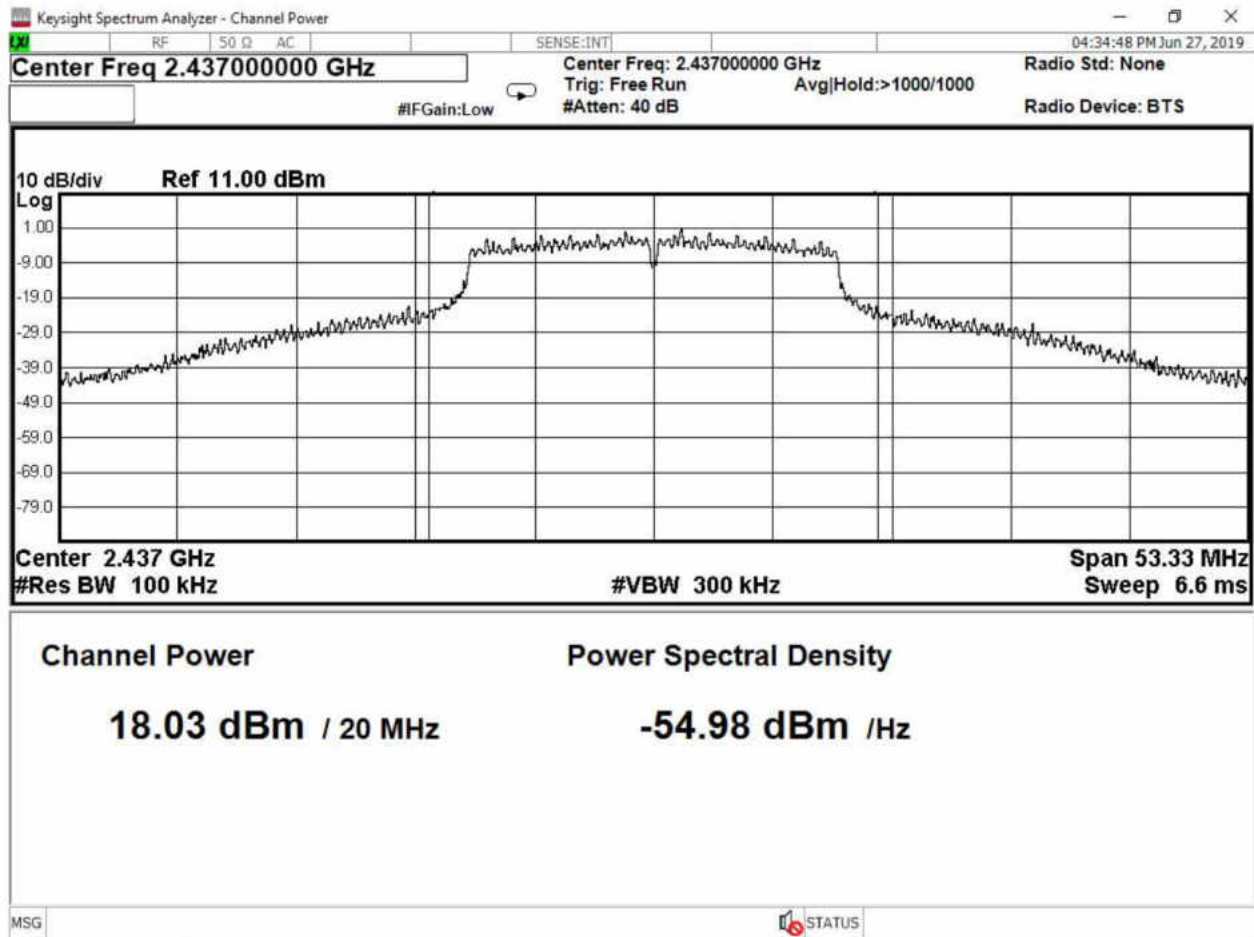
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Average Output Power Plots, 802.1b highest channel



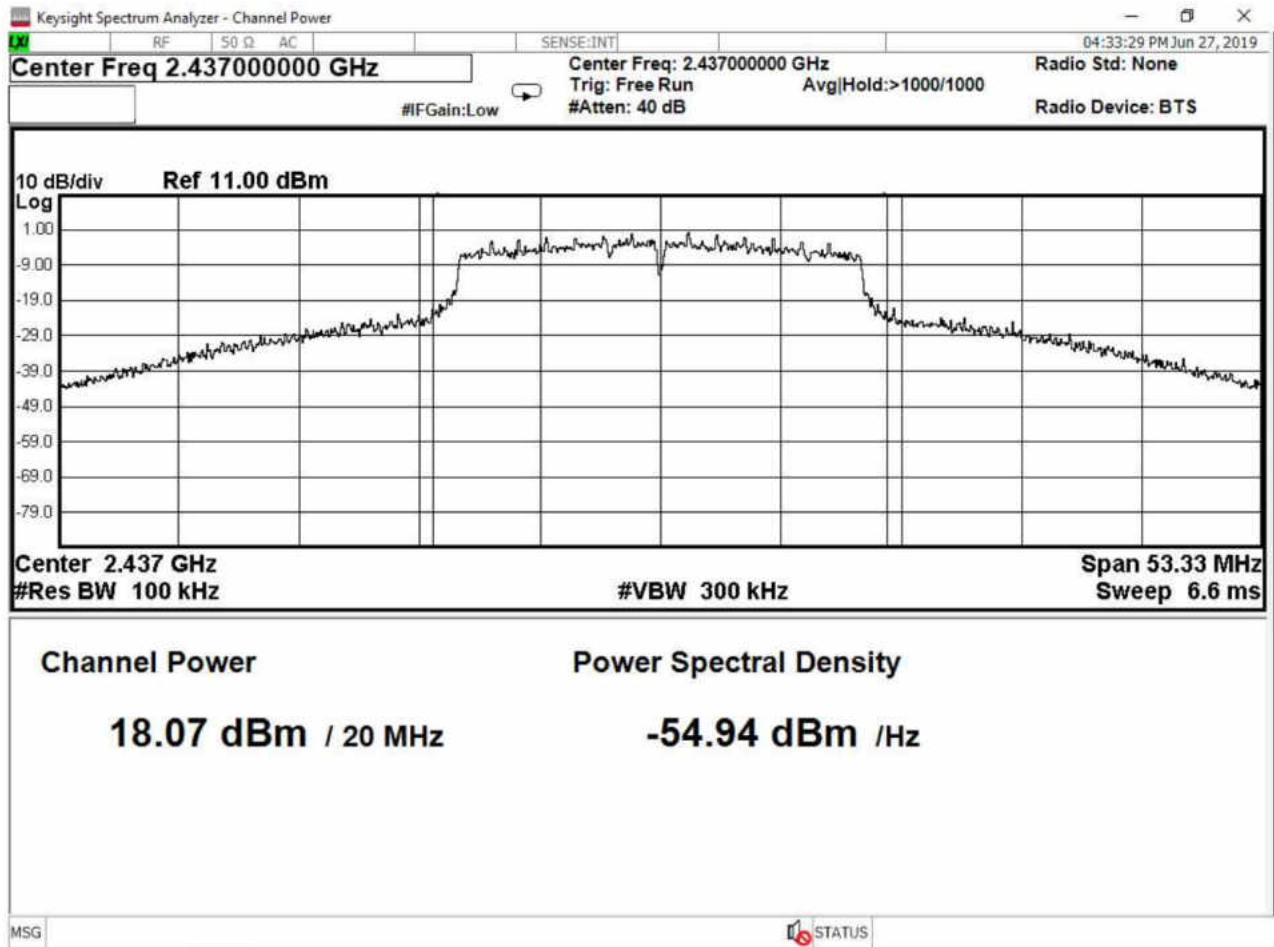
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Average Output Power Plots, 802.1g highest channel



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Average Output Power Plots, 802.1b highest channel



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4.4 BANDWIDTH

Test Method: ANSI C63.10,
1. Section(s) 11.8.1 “DTS Bandwidth, Option 1”

Limits of bandwidth measurements:

The 99% occupied bandwidth is displayed.

The 6dB bandwidth of the signal must be greater than 500 kHz.

Test procedures:

The EUT was connected to the spectrum analyzer directly with a low-loss shielded coaxial cable. The bandwidth of the fundamental frequency was measured by spectrum analyzer with 100 kHz RBW and 300 kHz VBW.

The 99% occupied is defined as the bandwidth at which 99% of the signal power is found. This corresponds to 20dB down from the maximum power level. The maximum power was measured with the largest resolution bandwidth possible (10MHz) and this value was recorded. The signal was then captured with a 1 MHz resolution bandwidth and the frequencies where the measurements were 20dB below the maximum power were marked. The bandwidth between these frequencies was recorded as the 99% occupied bandwidth.

The 6 dB bandwidth is defined as the bandwidth of which is higher than peak power minus 6dB.

For peak output power measurements, the EUT was connected to the spectrum analyzer directly with a low-loss shielded coaxial cable with 3 MHz RBW and 10 MHz VBW.

Deviations from test standard:

No deviation

Test setup:

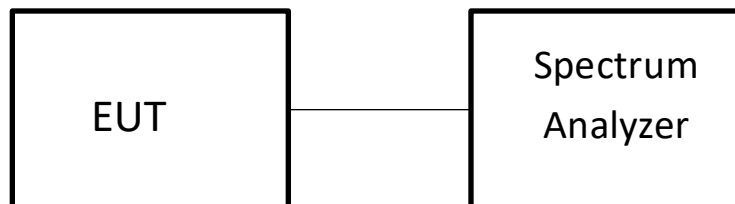


Figure 7 – Peak Output Power Measurements Test Setup

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EUT operating conditions:

The EUT was powered by internal battery power unless specified and set to transmit continuously on the lowest frequency channel, highest frequency channel and one in the middle of its operating range.

Test results:

99% Occupied Bandwidth

CHANNEL	CHANNEL FREQUENCY (MHz)	WIFI Type	99% Occupied BW (MHz)
Low	2412	802.11b	13.981
Middle	2437	802.11b	14.120
High	2462	802.11b	14.002
Low	2412	802.11g	16.491
Middle	2437	802.11g	18.655
High	2462	802.11g	16.536
Low	2412	802.11n	17.673
Middle	2437	802.11n	18.706
High	2462	802.11n	17.684

6dB Bandwidth

CHANNEL	CHANNEL FREQUENCY (MHz)	WIFI Type	6 dB BW (MHz)
Low	2412	802.11b	9.446
Middle	2437	802.11b	8.664
High	2462	802.11b	8.292
Low	2412	802.11g	16.29
Middle	2437	802.11g	16.37
High	2462	802.11g	15.70
Low	2412	802.11n	15.75
Middle	2437	802.11n	16.29
High	2462	802.11n	16.29

	Report Number:	R20181130-20-05	Rev	A
	Prepared for:	Garmin		

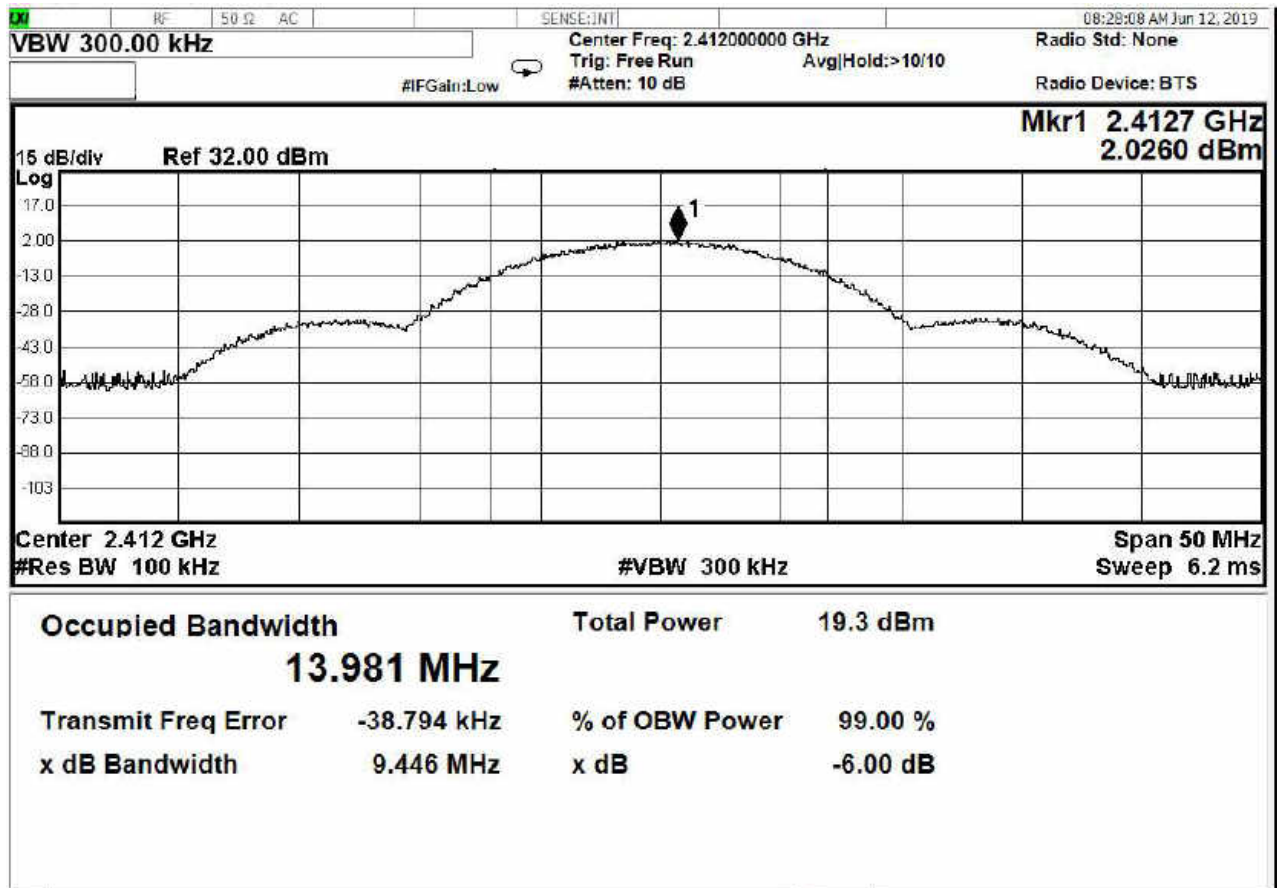


Figure 8 - Bandwidth, Low Channel, 802.11b

	Report Number:	R20181130-20-05	Rev	A
	Prepared for:	Garmin		

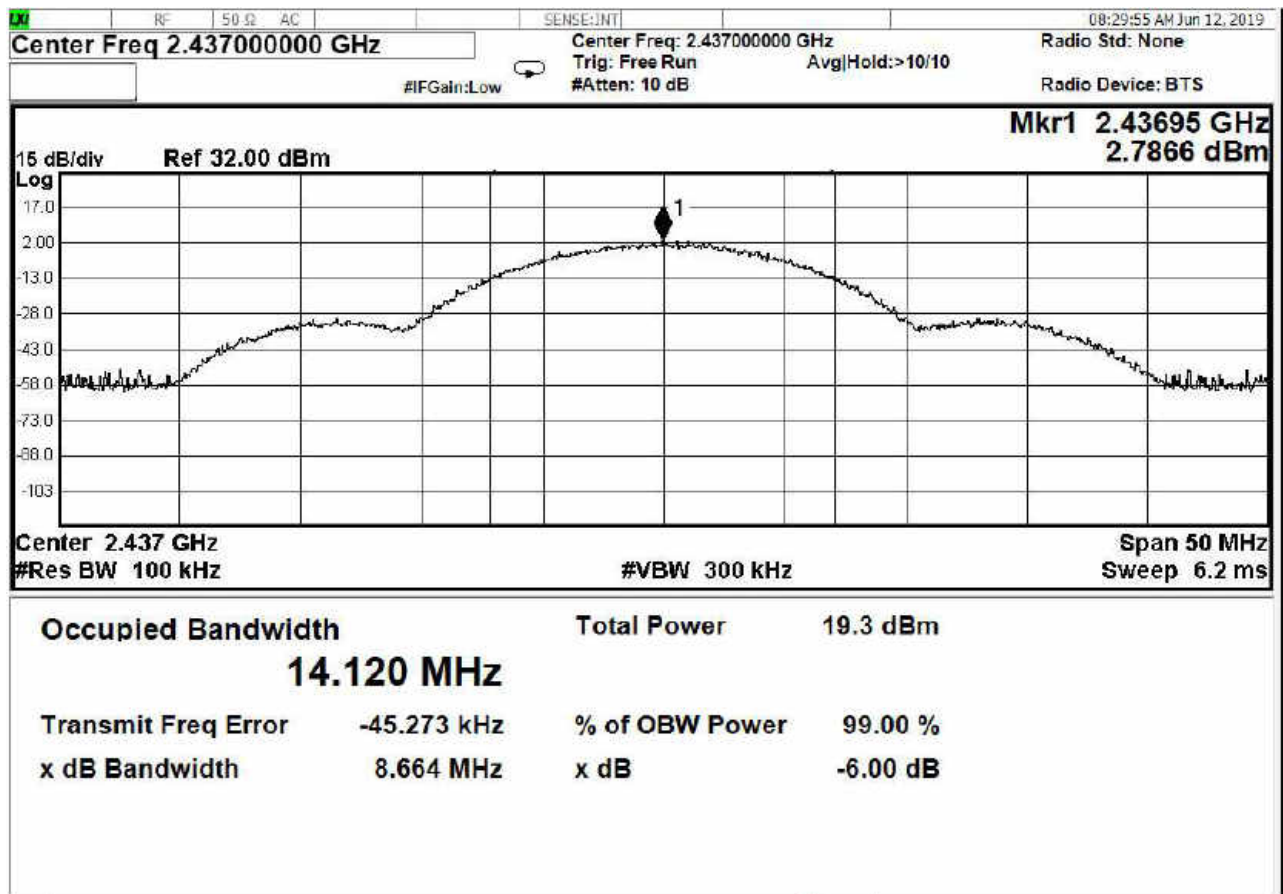


Figure 9 - Bandwidth, Mid Channel, 802.11b

	Report Number:	R20181130-20-05	Rev	A
	Prepared for:	Garmin		

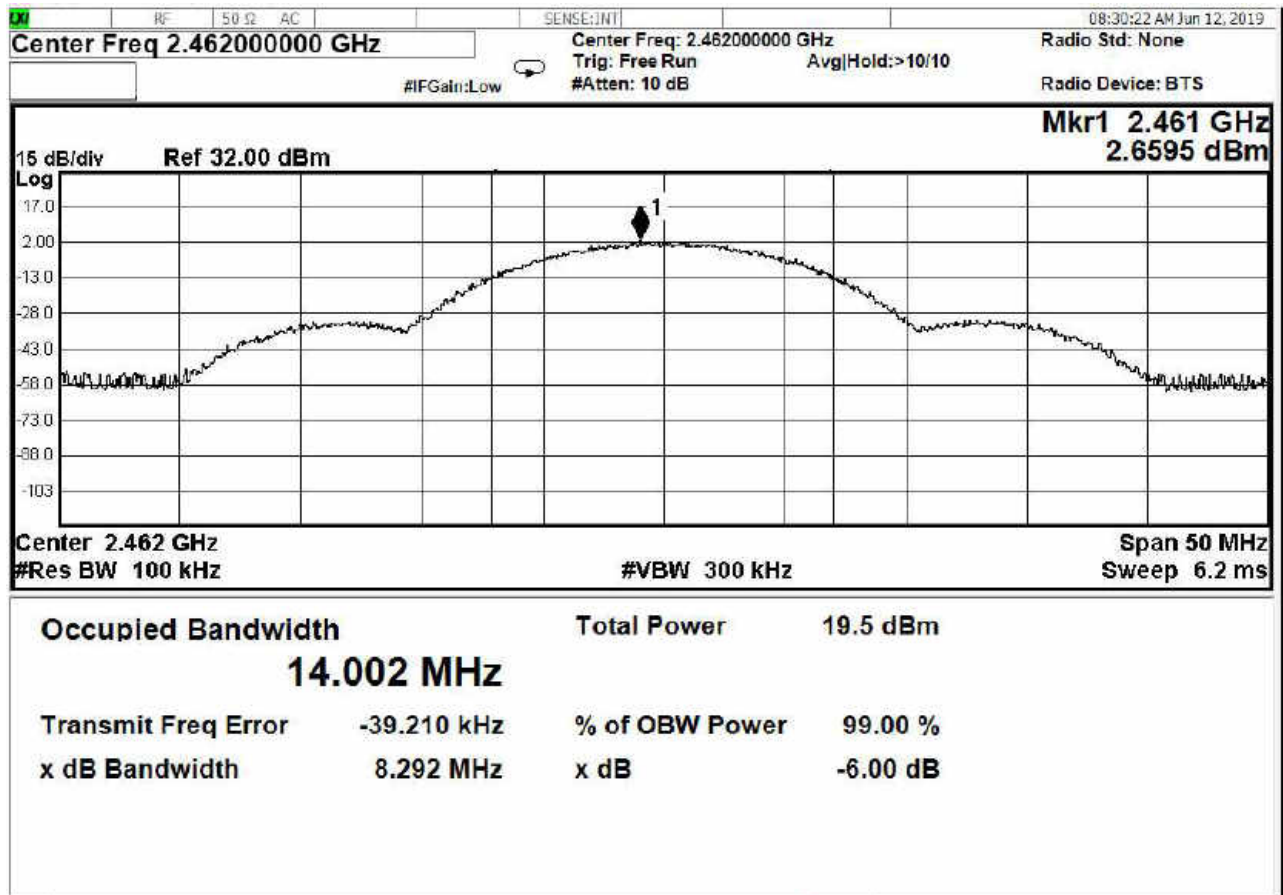


Figure 10 - Bandwidth, High Channel, 802.11b

	Report Number:	R20181130-20-05	Rev	A
	Prepared for:	Garmin		

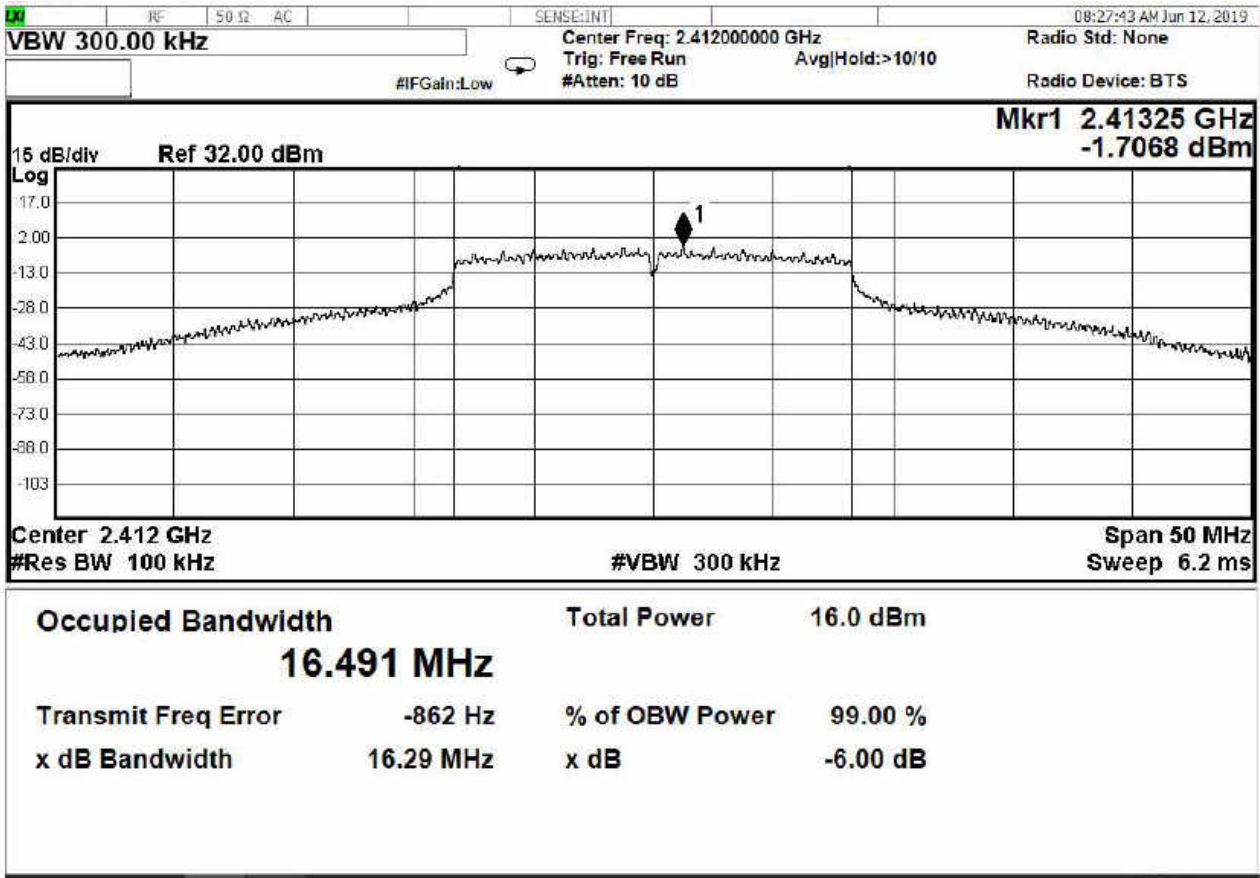


Figure 11 - Bandwidth, Low Channel, 802.11g

	Report Number:	R20181130-20-05	Rev	A
	Prepared for:	Garmin		

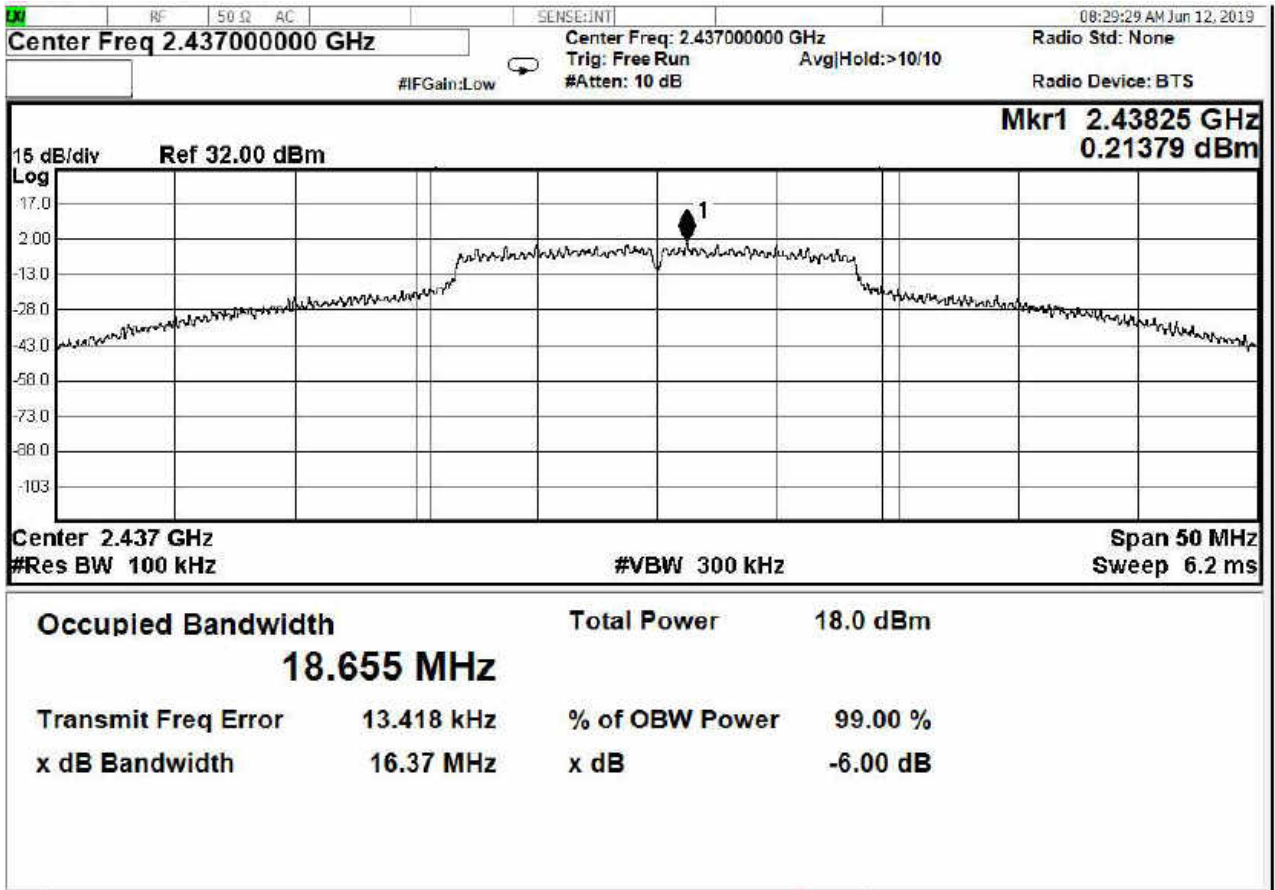


Figure 12 - Bandwidth, Mid Channel, 802.11g

	Report Number:	R20181130-20-05	Rev	A
	Prepared for:	Garmin		

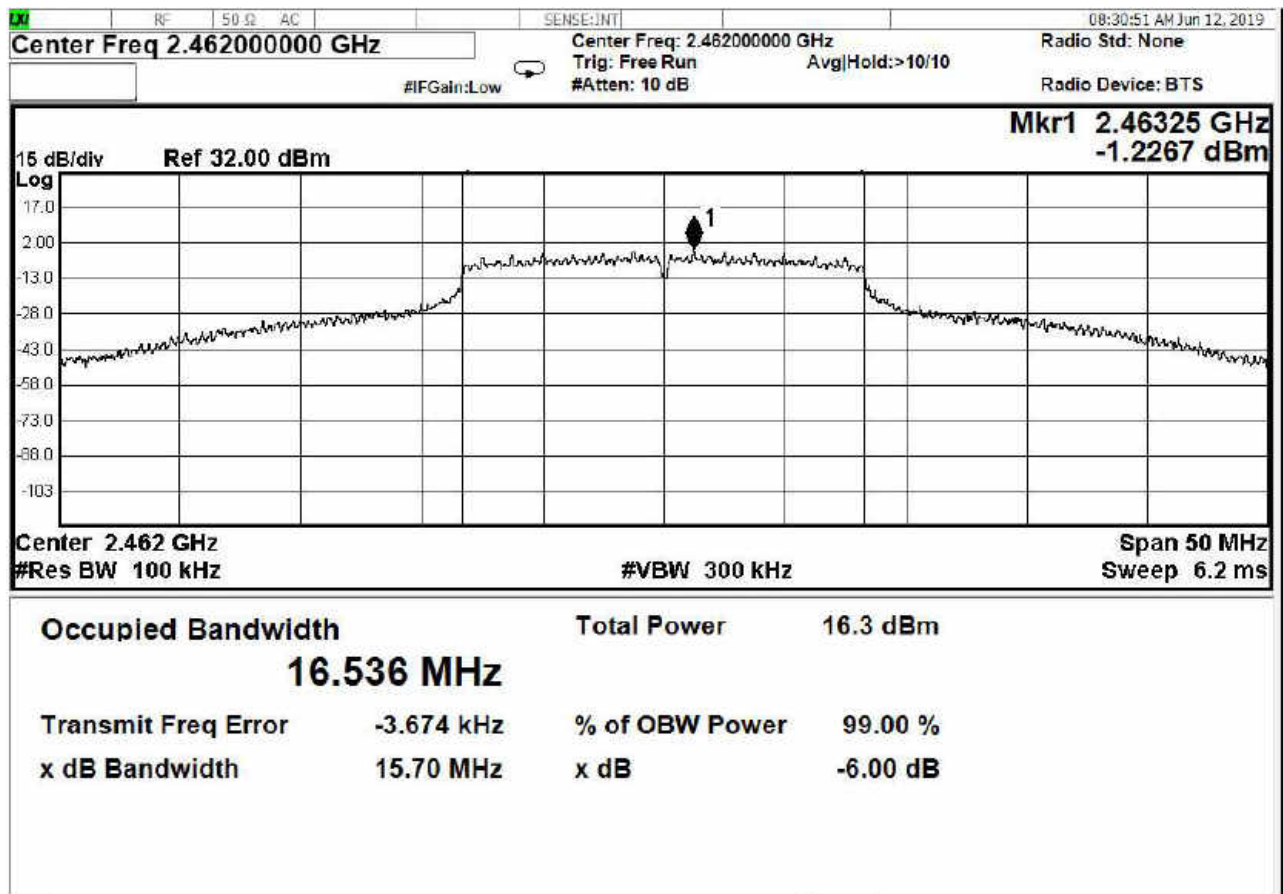


Figure 13 - Bandwidth, High Channel, 802.11g

	Report Number:	R20181130-20-05	Rev	A
	Prepared for:	Garmin		

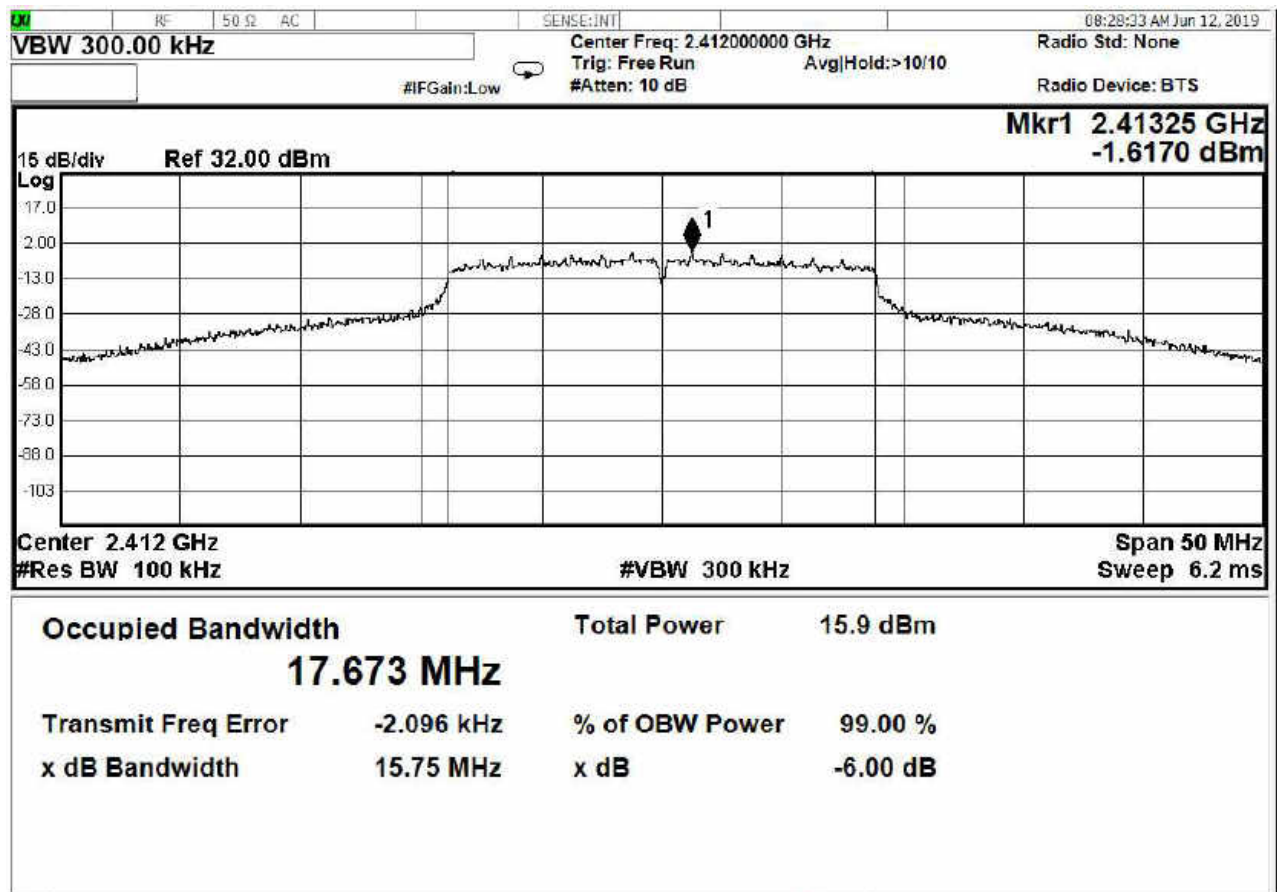


Figure 14 - Bandwidth, Low Channel, 802.11n

	Report Number:	R20181130-20-05	Rev	A
	Prepared for:	Garmin		

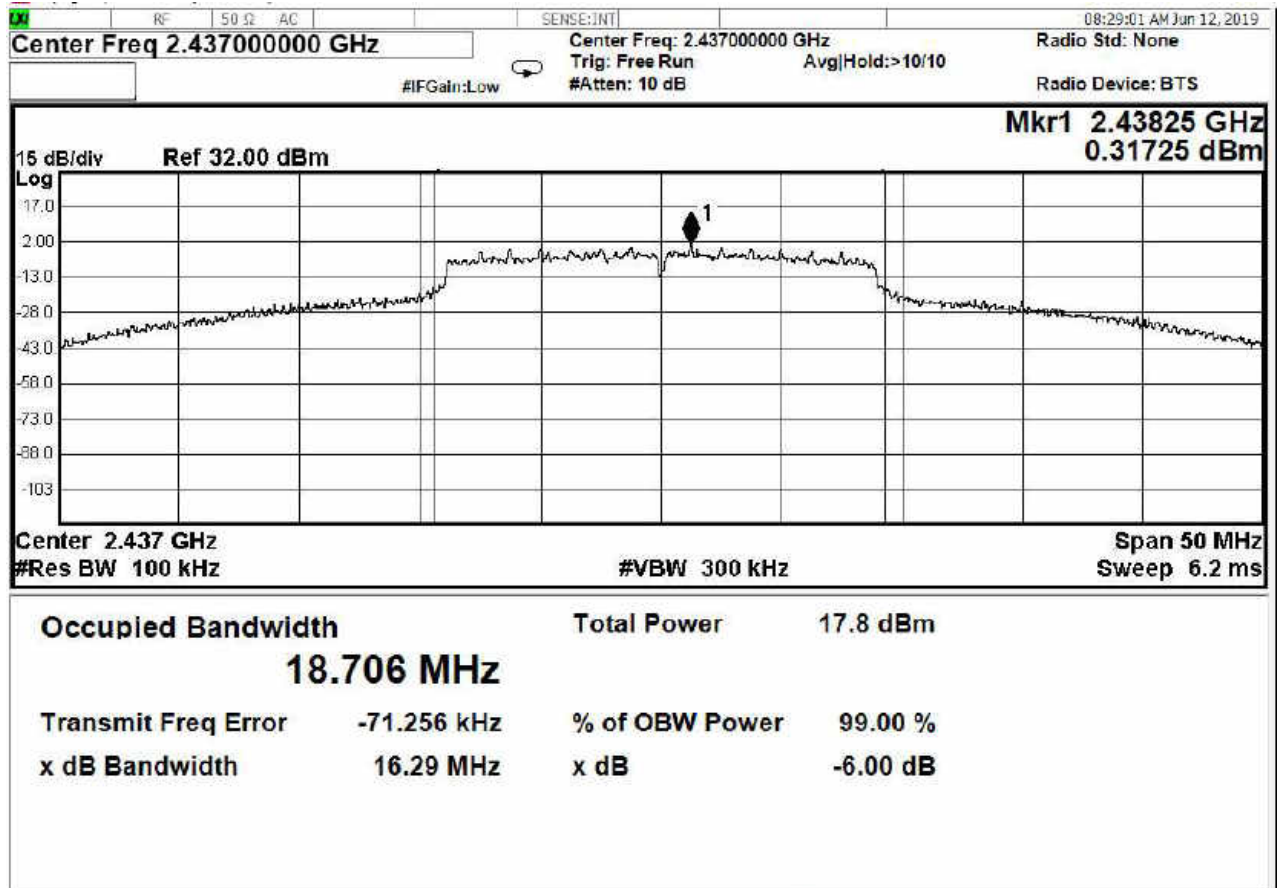


Figure 15 - Bandwidth, Mid Channel, 802.11n

	Report Number:	R20181130-20-05	Rev	A
	Prepared for:	Garmin		

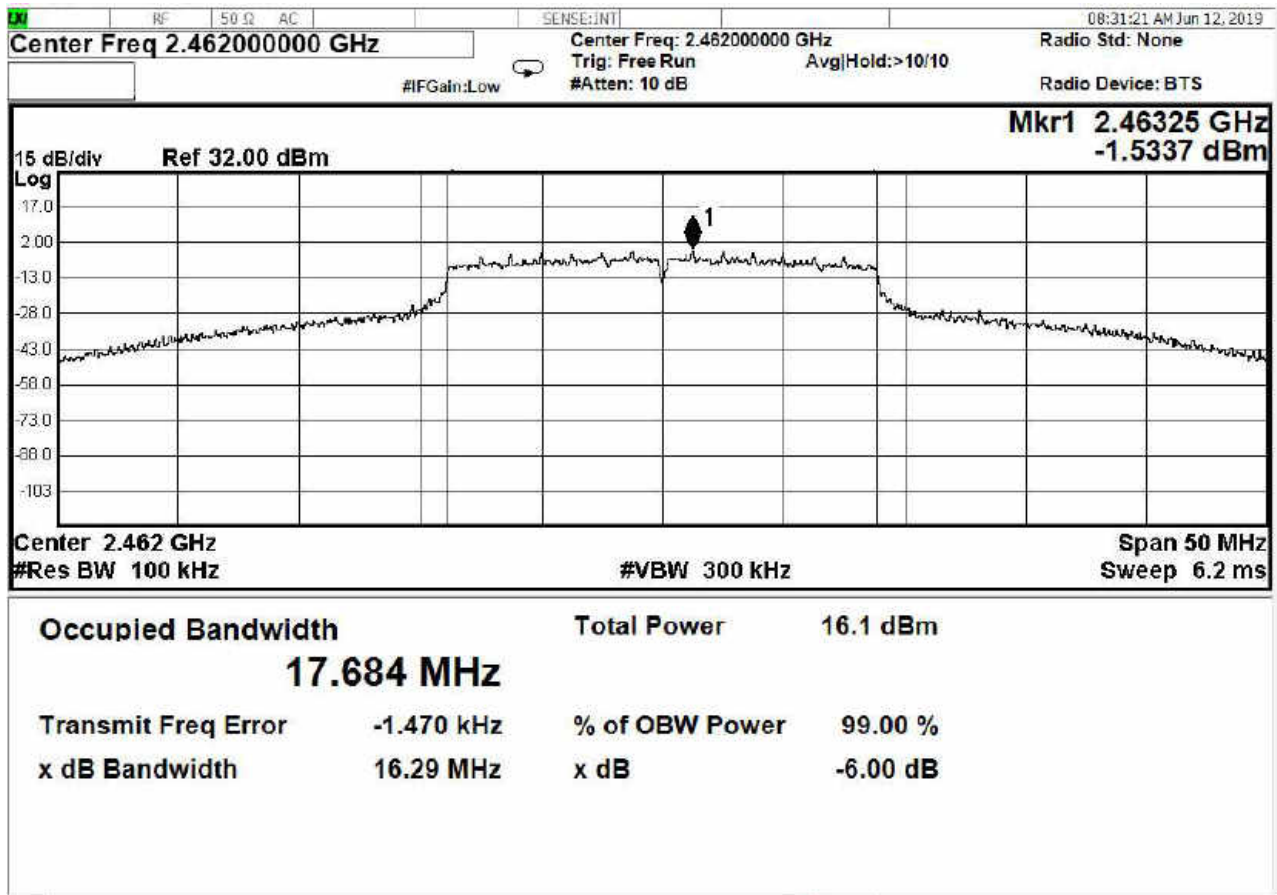


Figure 16 - Bandwidth, High Channel, 802.11n

	Report Number:	R20181130-20-05	Rev	A
	Prepared for:	Garmin		

4.5 BANDEDGES

Test Method: ANSI C63.10:

1. Section 6.10.5 (used for restricted bands)
2. Section 11.13.2 "Marker-delta method" (for unrestricted bands)
3. Section 11.11, "Measurement in unrestricted frequency bands"

Limits of bandedge measurements:

For emissions outside of the allowed band of operation (2400.0MHz – 2480.0MHz), the emission level needs to be 20dB under the maximum fundamental field strength. However, if the emissions fall within one of the restricted bands from 15.205 the field strength levels need to be under that of the limits in 15.209.

Test procedures:

The EUT was tested in the same method as described in section 4.4 - *Bandwidth*. The resolution bandwidth was set to 100kHz and video bandwidth to 300 kHz the EMI receiver was used to scan from the bandedge to the fundamental frequency with a quasi-peak detector. The highest emissions level beyond the bandedge was measured and recorded. All band edge measurements were evaluated to the general limits in Part 15.209.

Deviations from test standard:

No deviation.

Test setup:

See Section 4.3

EUT operating conditions:

The EUT was powered by internal battery power unless specified and set to transmit continuously on the lowest frequency channel, highest frequency channel and one in the middle of its operating range.

	Report Number:	R20181130-20-05	Rev	A
	Prepared for:	Garmin		

Test results:

Highest Out of Band Emissions, 802.11b

CHANNEL	Band edge /Measurement Frequency (MHz)	Highest out of band level dBm	Fundamental Level (dBm)	Delta	Min (dBc)	Result
1	2400.0 (Unrestricted, Peak)	-28.543	3.7	32.243	20	PASS
1	2340.0 (Unrestricted, Average)	-26.931	2.963	29.894	20	PASS
11	2483.5 (Unrestricted, Peak)	-52.996	4.279	57.275	20	PASS
11	2483.5 (Unrestricted, Average)	-53.396	3.771	57.167	20	PASS

CHANNEL	Band edge /Measurement Frequency (MHz)	Highest out of band level (dBm)	Corrected Emission Level (dBm)	Margin	Limit* (dBm)	Gain (dBi)	Result
1	2390.0 (Restricted, Peak)	-49.846	-49.846	28.616	-21.23	0	PASS
1	2390.0 (Restricted, Average)	-50.693	-50.693	9.463	-41.23	0	PASS
11	2483.5 (Restricted, Peak)	-50.206	-50.206	28.976	-21.23	0	PASS
11	2483.5 (Restricted, Average)	-50.796	-50.796	9.566	-41.23	0	PASS

Corrected Emission level = Highest out of band level + Gain

Margin = Limit - Corrected Emission Level

*Limits from Part 15.209 in dBm **Antenna gain declared by the manufacturer

Part 15.209 Peak Limit = 74.00 dBμV/m

Part 15.209 Average Limit = 54.00 dBμV/m

$EIRP(dBm) = FS(dB\mu V/m) - 10(\log 10^9) + 10\log[0.3] = FS_{3m}(dB\mu V/m) - 95.23$

Peak Limit (delta) = 74.00 dBμV/m – 95.23 = -21.23dBm

Average Limit (delta) = 54.00 dBμV/m – 95.23 = -41.23dBm

	Report Number:	R20181130-20-05	Rev	A
	Prepared for:	Garmin		

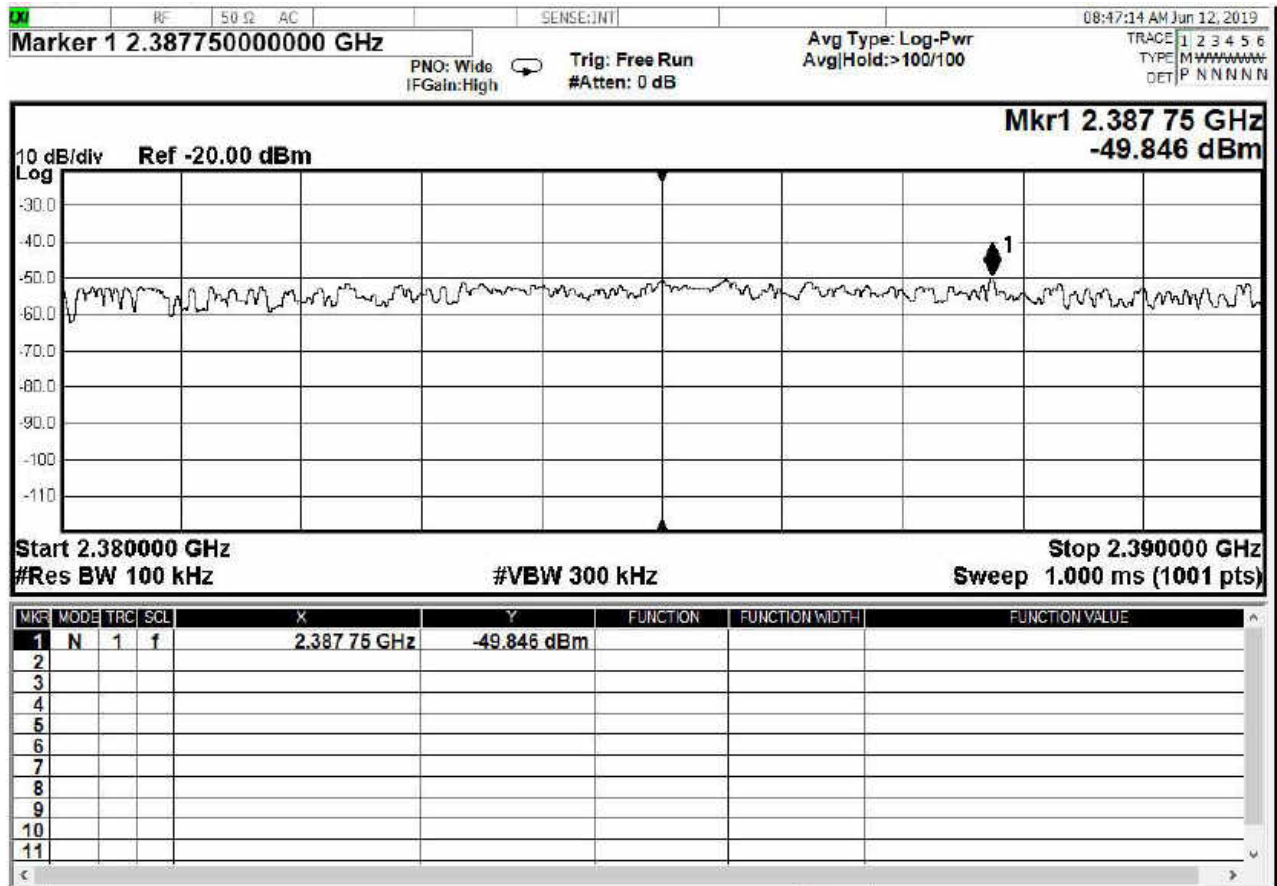


Figure 17 - Band-edge Measurement, Low Channel, Restricted Frequency, Peak

	Report Number:	R20181130-20-05	Rev	A
	Prepared for:	Garmin		

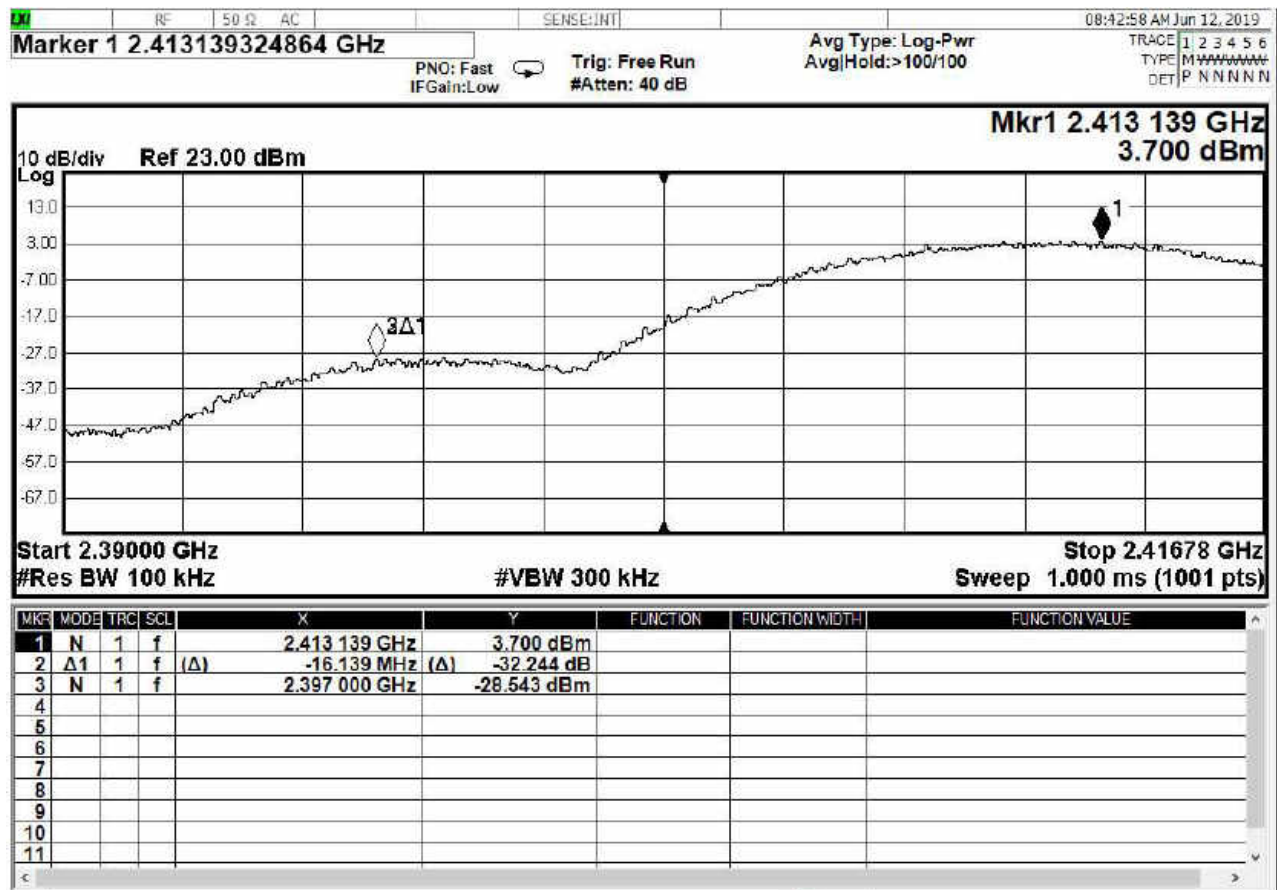


Figure 18 - Band-edge Measurement, Low Channel, Fundamental, Peak

	Report Number:	R20181130-20-05	Rev	A
	Prepared for:	Garmin		

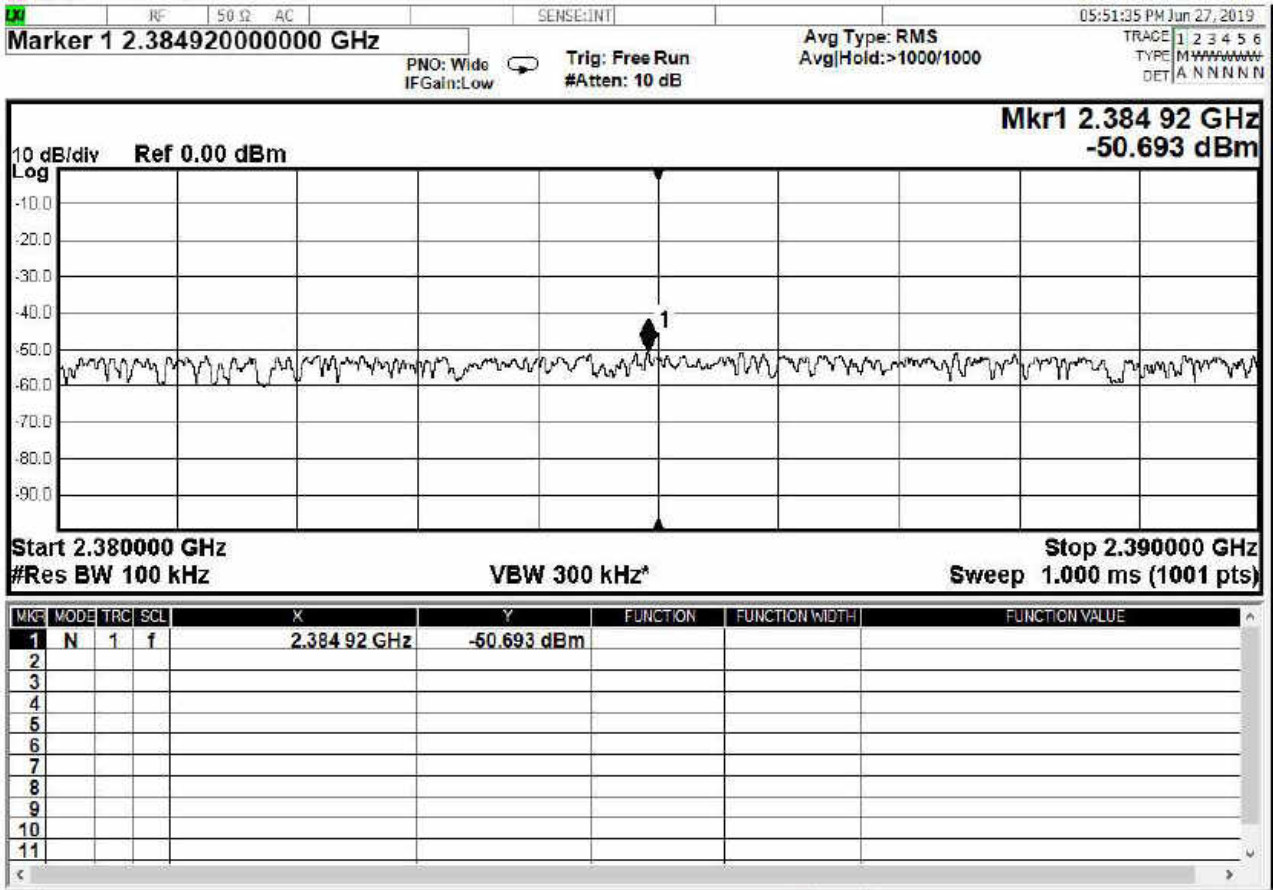


Figure 19 - Band-edge Measurement, Low Channel, Restricted Frequency, Average

	Report Number:	R20181130-20-05	Rev	A
	Prepared for:	Garmin		

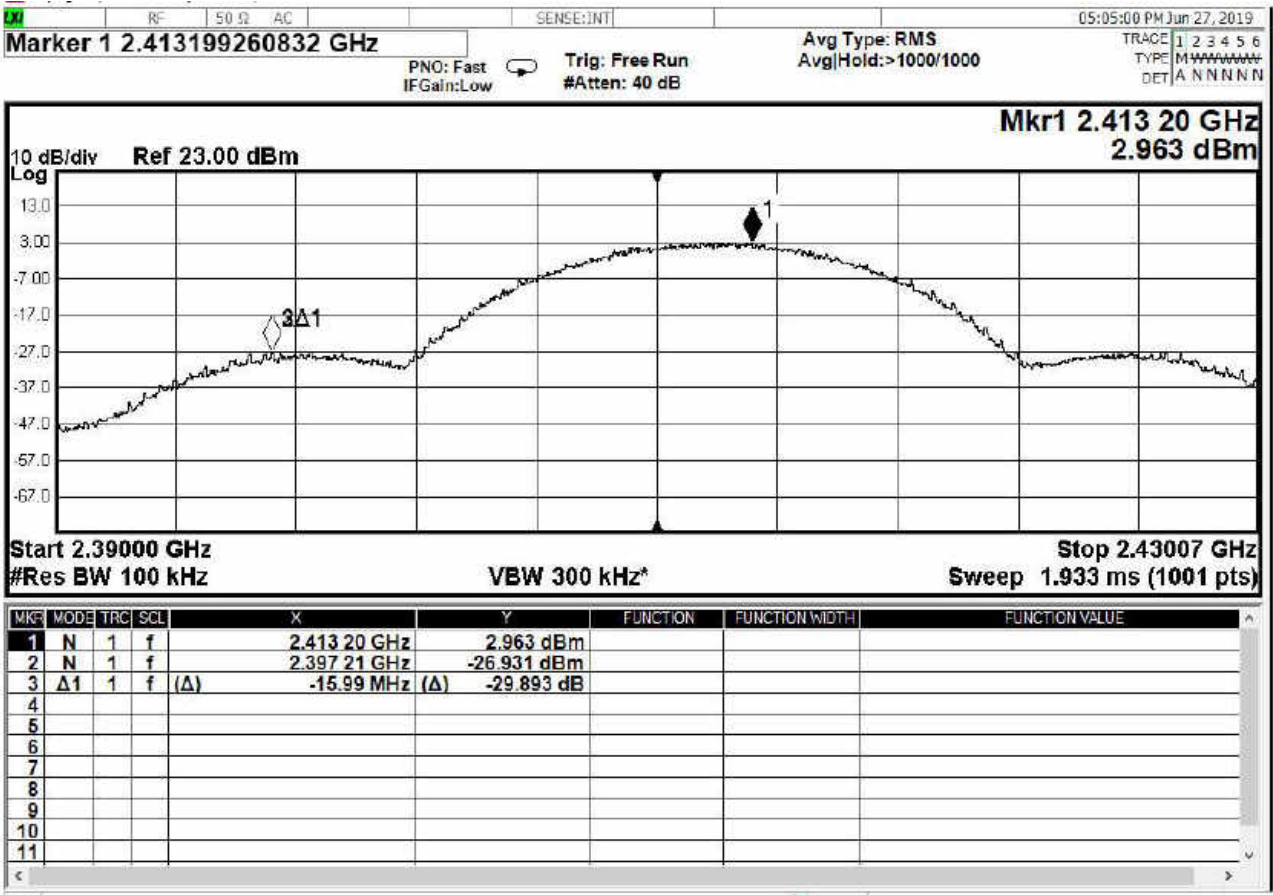


Figure 20 - Band-edge Measurement, Low Channel, Fundamental, Average

	Report Number:	R20181130-20-05	Rev	A
	Prepared for:	Garmin		

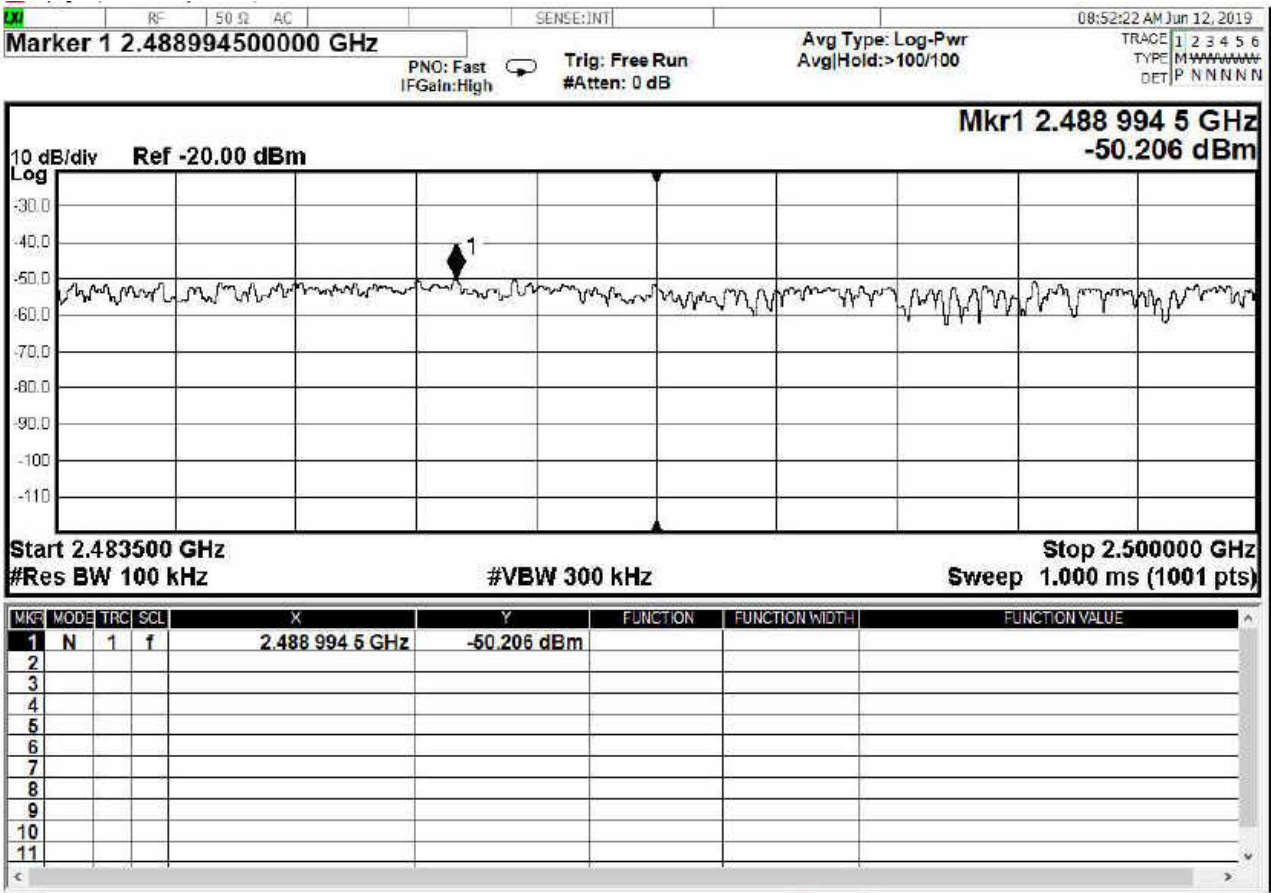


Figure 21 - Band-edge Measurement, High Channel, Restricted Frequency, Peak

	Report Number:	R20181130-20-05	Rev	A
	Prepared for:	Garmin		

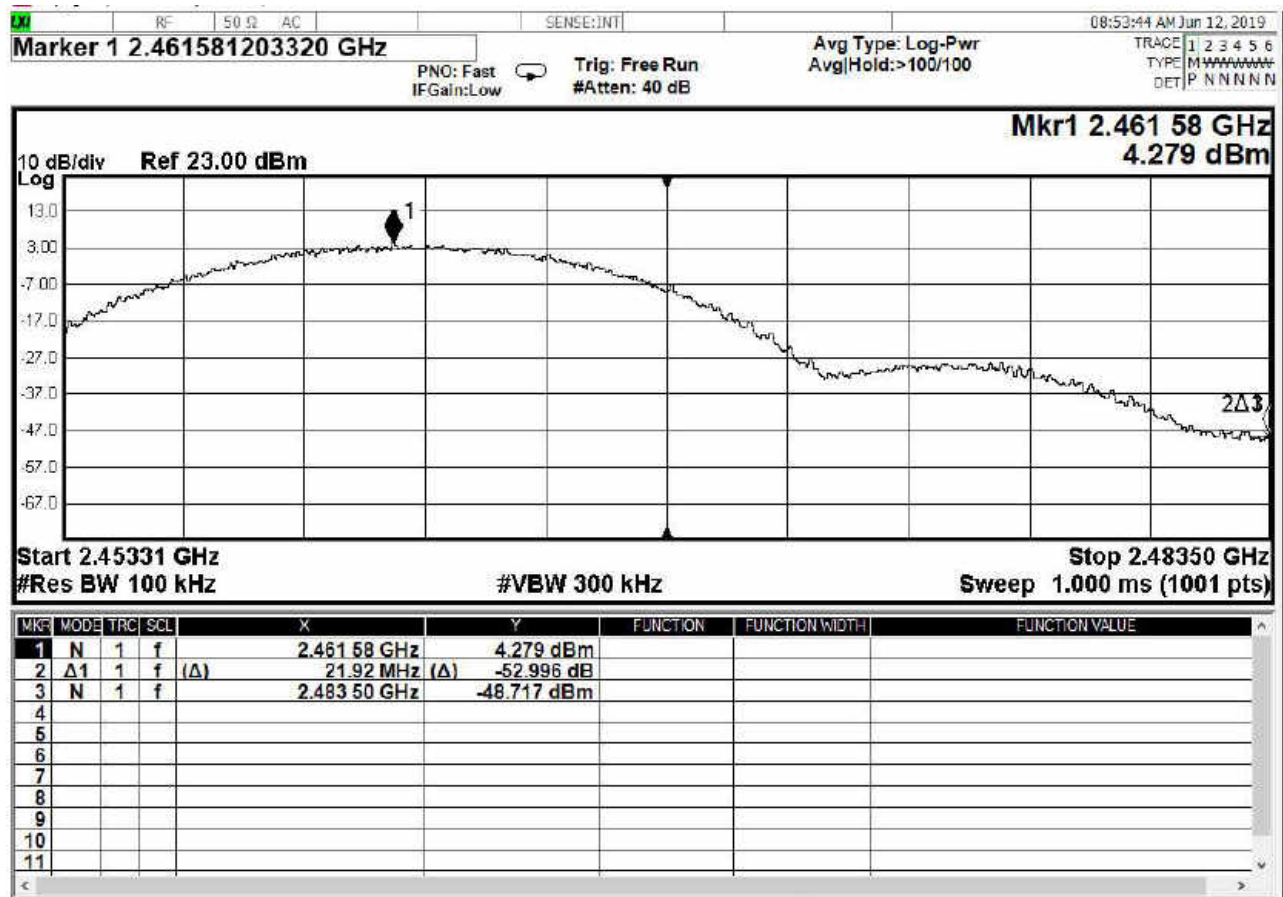


Figure 22 - Band-edge Measurement, High Channel, Fundamental, Peak

	Report Number:	R20181130-20-05	Rev	A
	Prepared for:	Garmin		

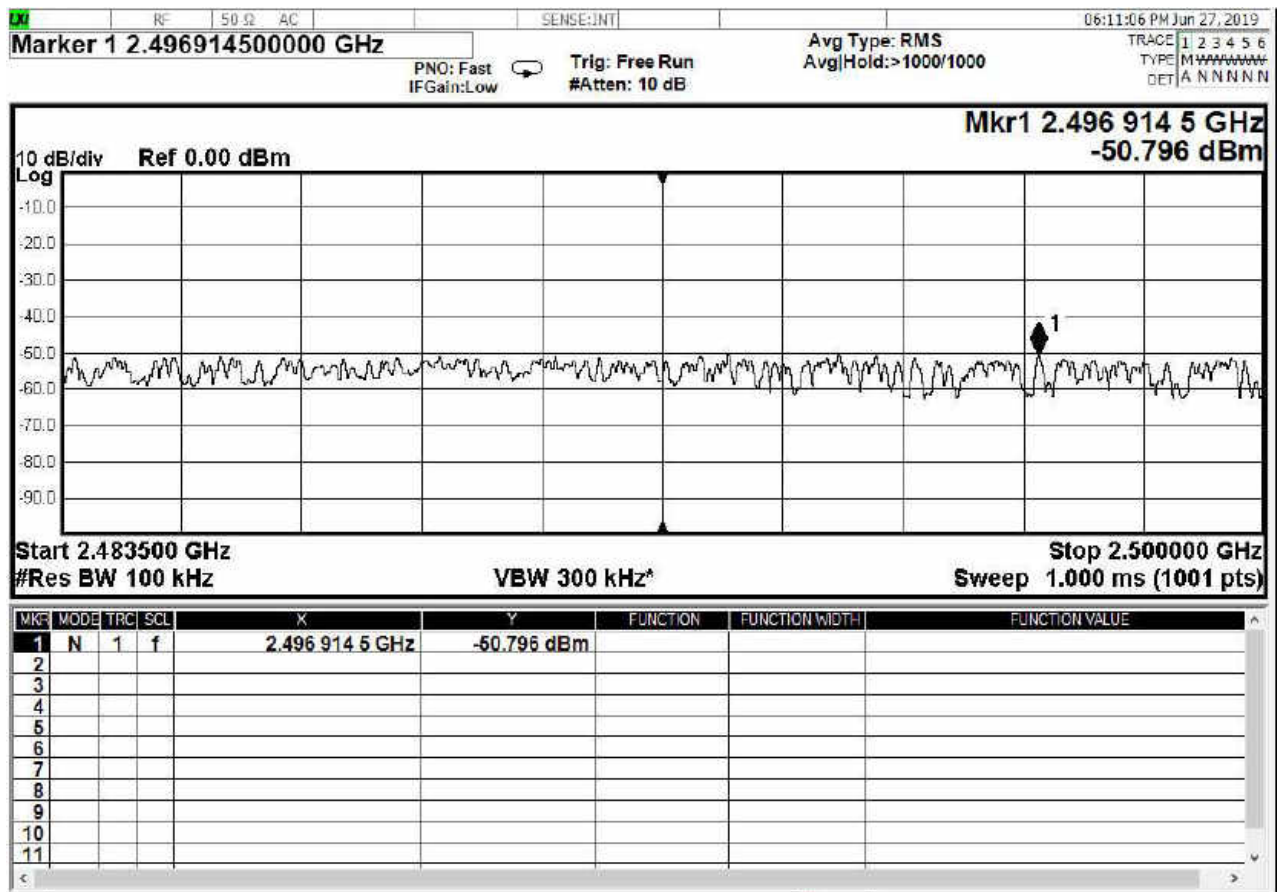


Figure 23 - Band-edge Measurement, High Channel, Restricted Frequency, Average

	Report Number:	R20181130-20-05	Rev	A
	Prepared for:	Garmin		

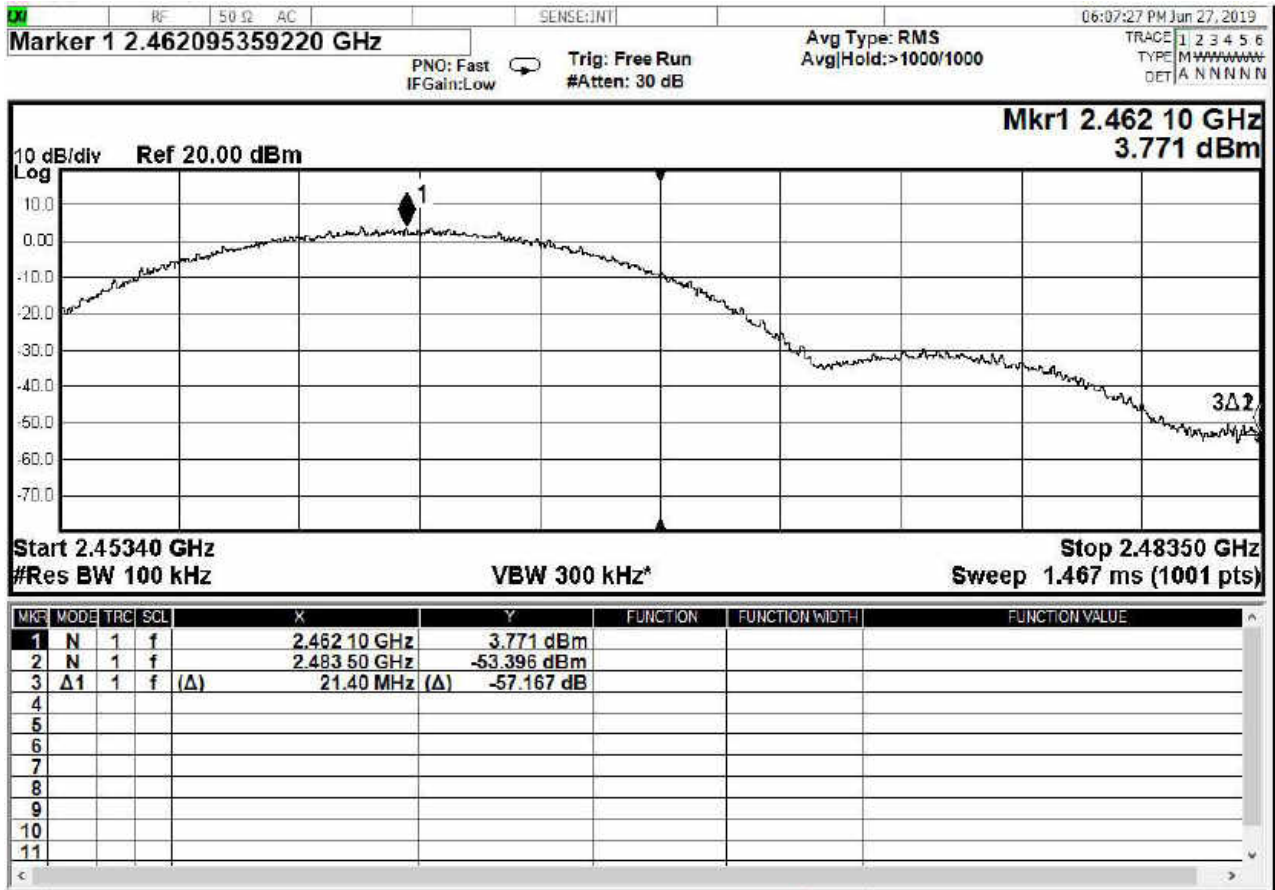


Figure 24 - Band-edge Measurement, High Channel, Fundamental, Average

	Report Number:	R20181130-20-05	Rev	A
	Prepared for:	Garmin		

Highest Out of Band Emissions, 802.11g

CHANNEL	Band edge /Measurement Frequency (MHz)	Highest out of band level dBm	Fundamental Level (dBm)	Delta	Min (dBc)	Result
1	2400.0 (Unrestricted, Peak)	-25.909	-0.677	25.232	20	PASS
1	2340.0 (Unrestricted, Average)	-23.935	-1.009	22.926	20	PASS
11	2483.5 (Unrestricted, Peak)	-39.396	-0.193	39.203	20	PASS
11	2483.5 (Unrestricted, Average)	-39.864	-0.602	39.262	20	PASS

CHANNEL	Band edge /Measurement Frequency (MHz)	Highest out of band level (dBm)	Corrected Emission Level (dBm)	Margin	Limit* (dBm)	Gain (dBi)	Result
1	2390.0 (Restricted, Peak)	-40.141	-40.141	18.911	-21.23	0	PASS
1	2390.0 (Restricted, Average)	-54.587	-54.587	13.357	-41.23	0	PASS
11	2483.5 (Restricted, Peak)	-38.785	-38.785	17.555	-21.23	0	PASS
11	2483.5 (Restricted, Average)	-51.206	-51.206	9.976	-41.23	0	PASS

Corrected Emission level= Highest out of band level +Gain

Margin= Limit-Corrected Emission Level

*Limits from Part 15.209 in dBm **Antenna gain declared by the manufacturer

Part 15.209 Peak Limit = 74.00 dBμV/m

Part 15.209 Average Limit = 54.00 dBμV/m

$EIRP(dBm) = FS(dB\mu V/m) - 10(\log 10^9) + 10\log[0.3] = FS_{3m}(dB\mu V/m) - 95.23$

Peak Limit (delta) = 74.00 dBμV/m – 95.23 = -21.23dBm

Average Limit (delta) = 54.00 dBμV/m – 95.23 = -41.23dBm

	Report Number:	R20181130-20-05	Rev	A
	Prepared for:	Garmin		

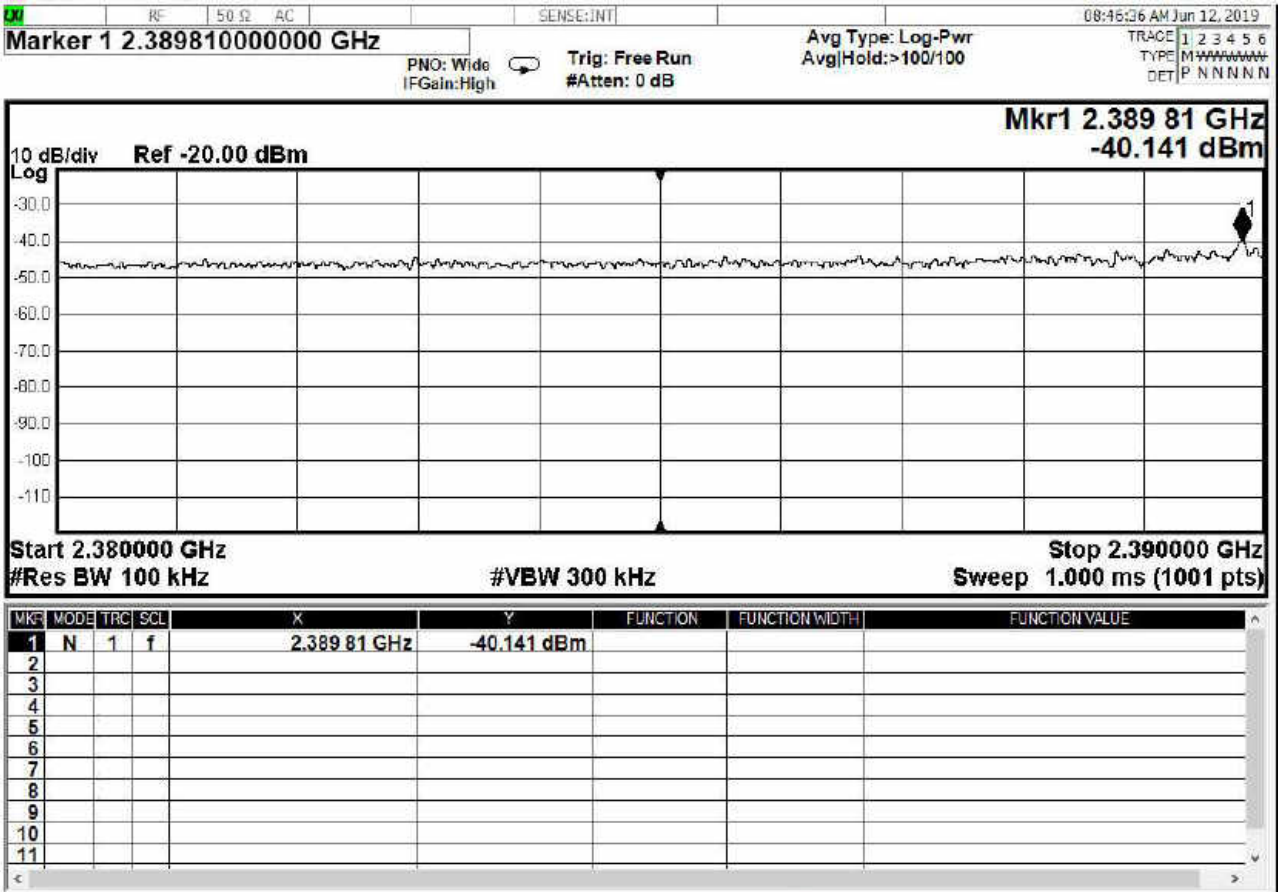


Figure 25 - Band-edge Measurement, Low Channel, Restricted Frequency, Peak

	Report Number:	R20181130-20-05	Rev	A
	Prepared for:	Garmin		

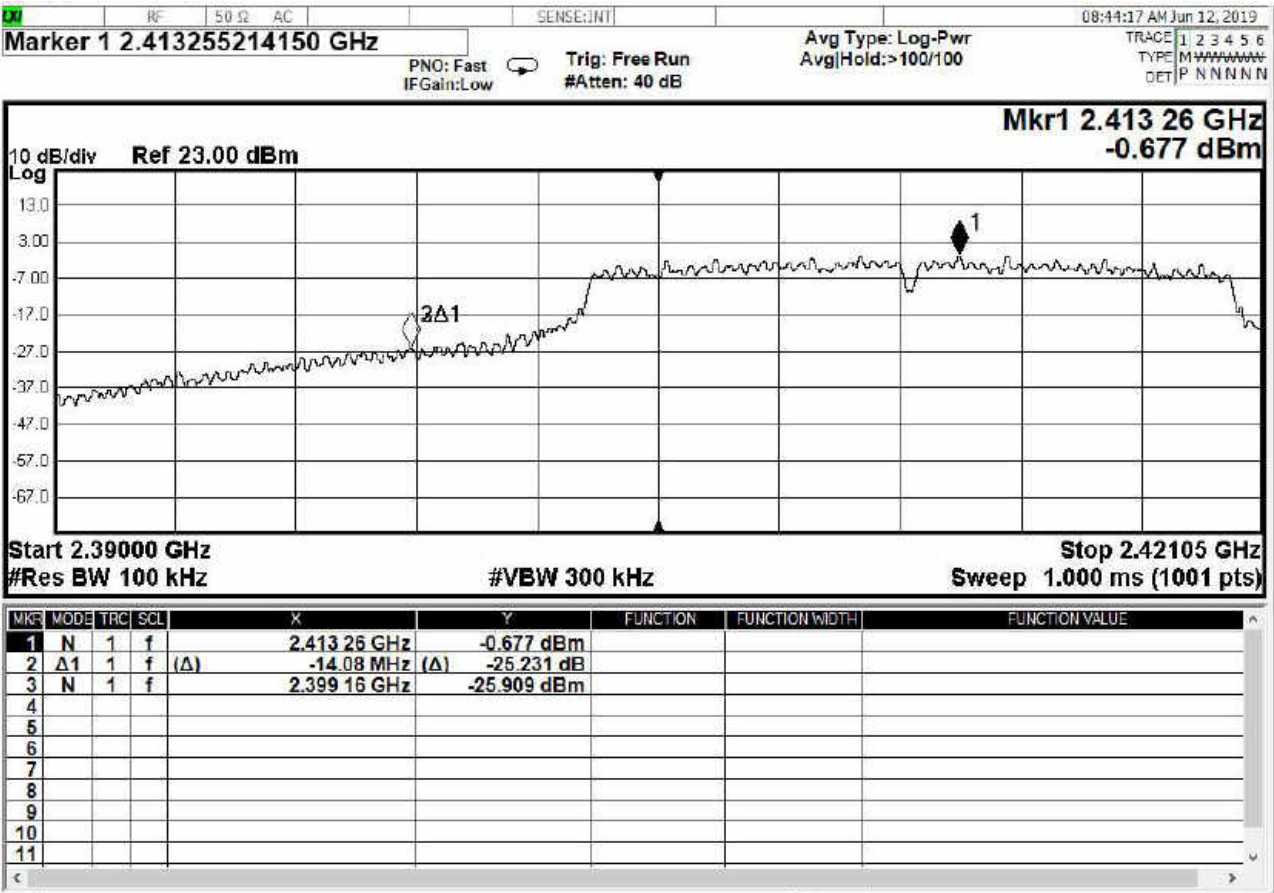


Figure 26 - Band-edge Measurement, Low Channel, Fundamental, Peak

	Report Number:	R20181130-20-05	Rev	A
	Prepared for:	Garmin		

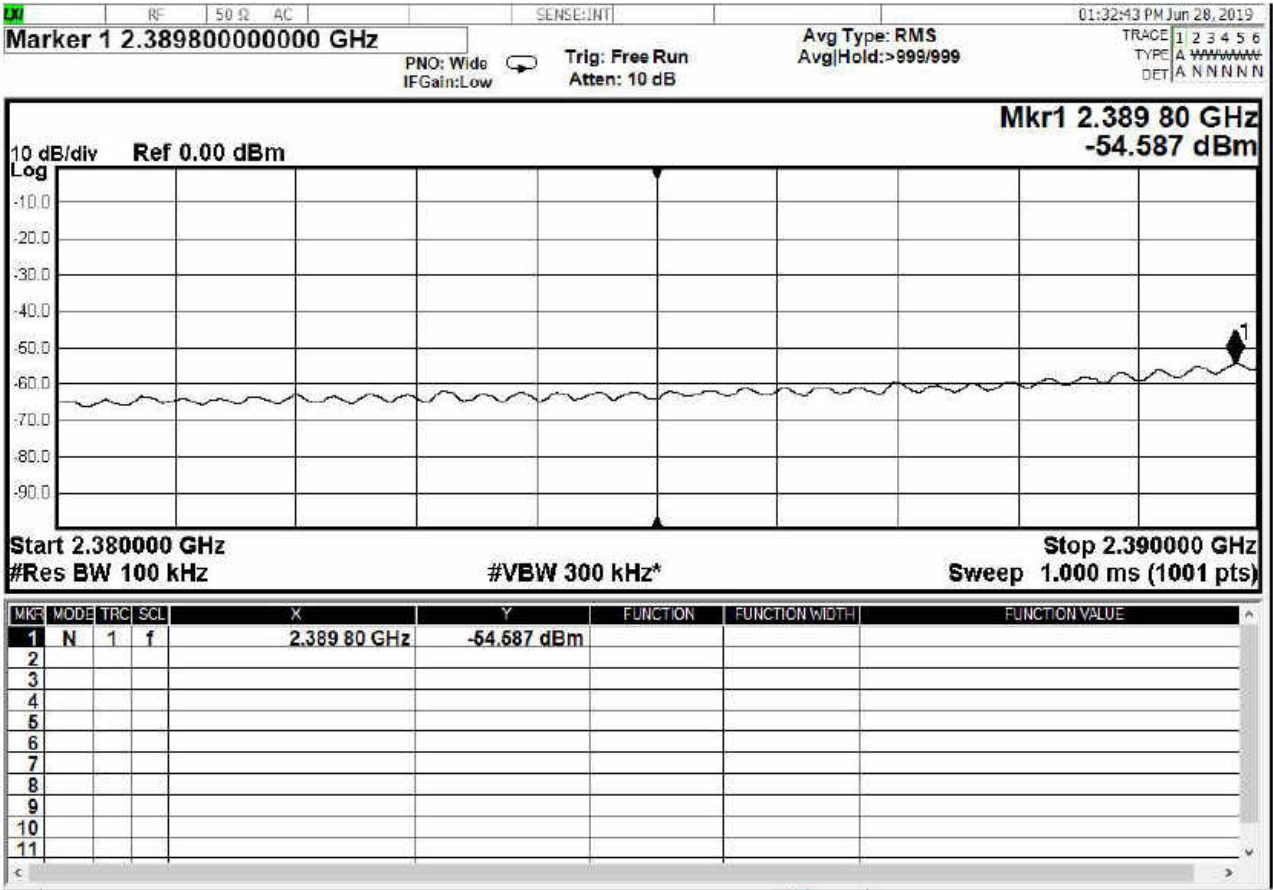


Figure 27 - Band-edge Measurement, Low Channel, Restricted Frequency, Average

	Report Number:	R20181130-20-05	Rev	A
	Prepared for:	Garmin		

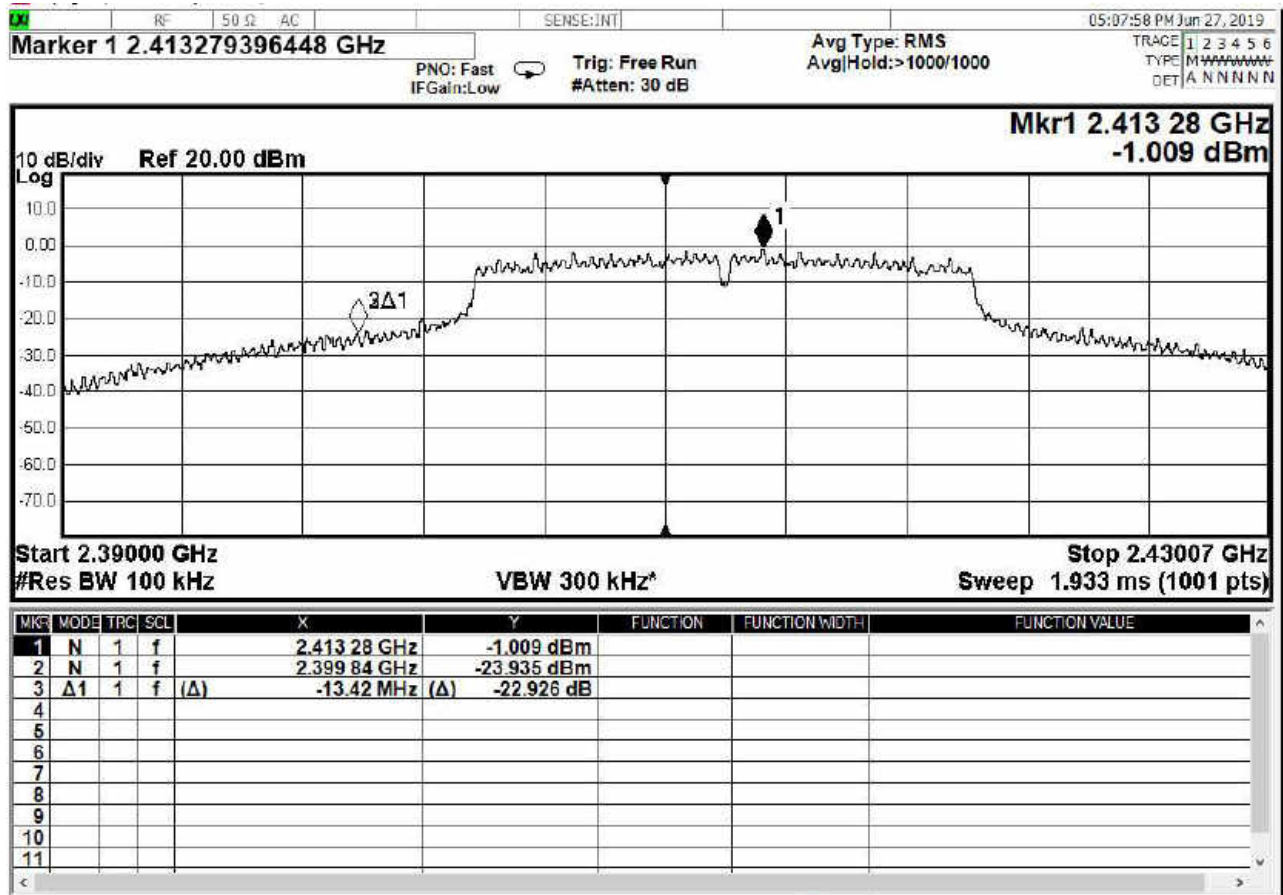


Figure 28 - Band-edge Measurement, Low Channel, Fundamental, Average

	Report Number:	R20181130-20-05	Rev	A
	Prepared for:	Garmin		

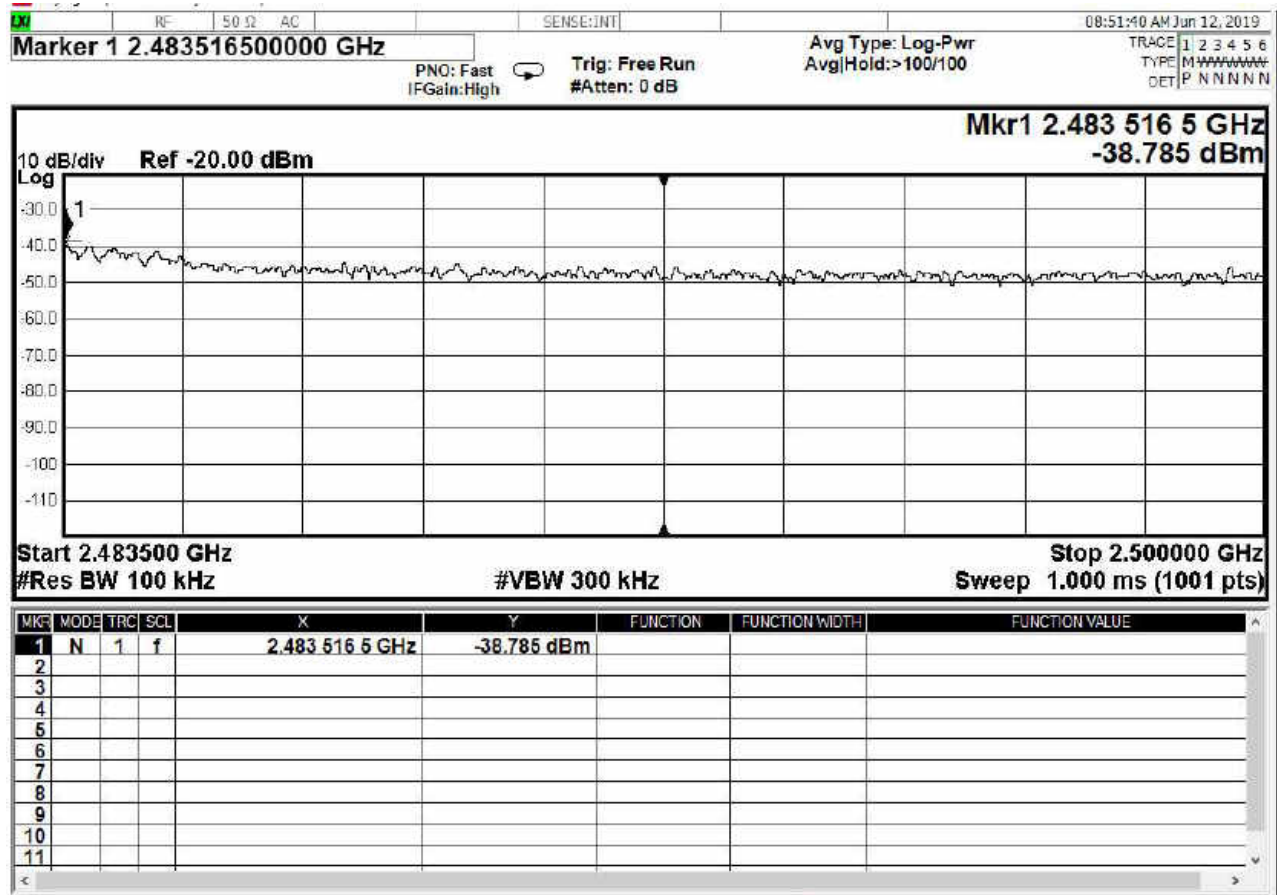


Figure 29 - Band-edge Measurement, High Channel, Restricted Frequency, Peak

	Report Number:	R20181130-20-05	Rev	A
	Prepared for:	Garmin		

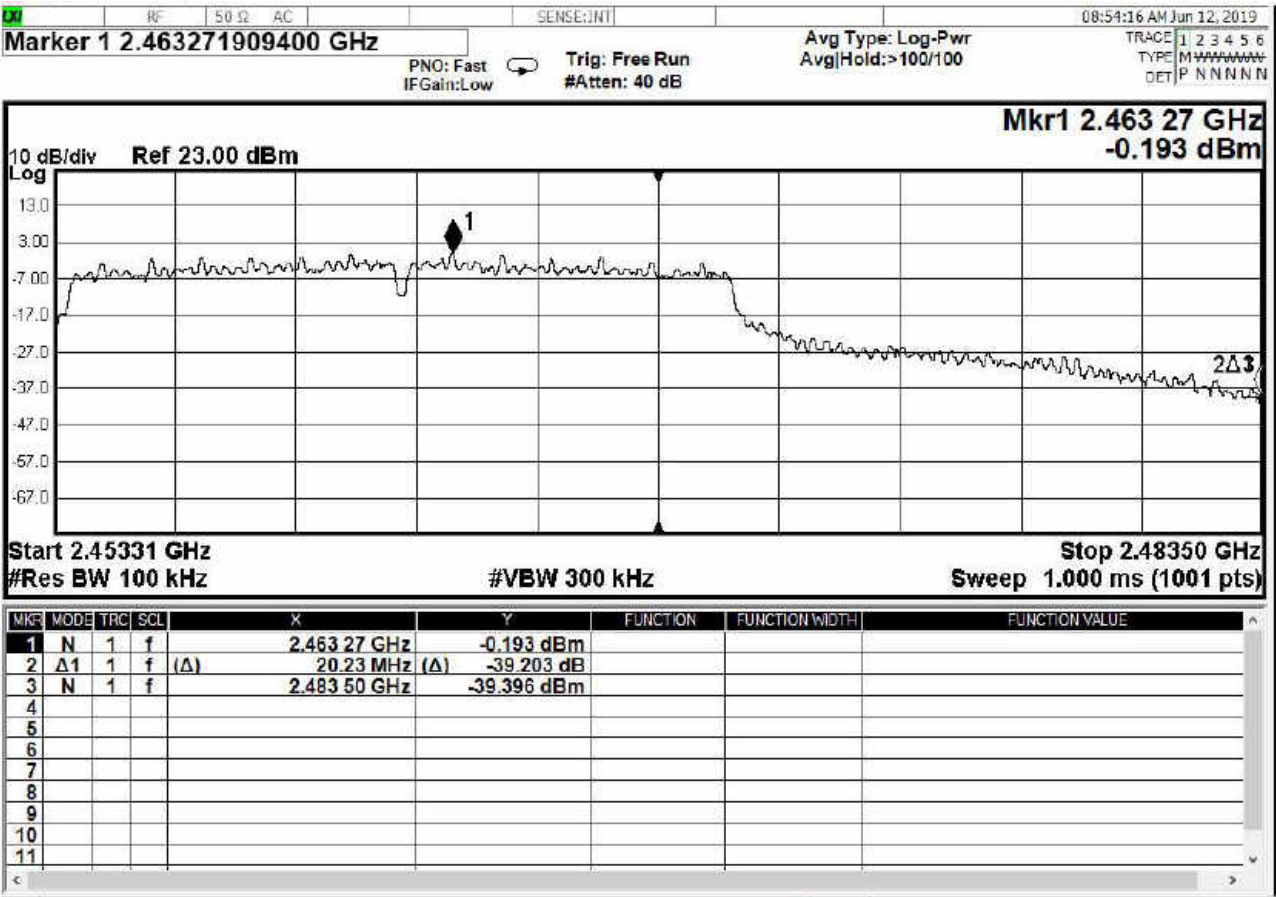


Figure 30 - Band-edge Measurement, High Channel, Fundamental, Peak

	Report Number:	R20181130-20-05	Rev	A
	Prepared for:	Garmin		

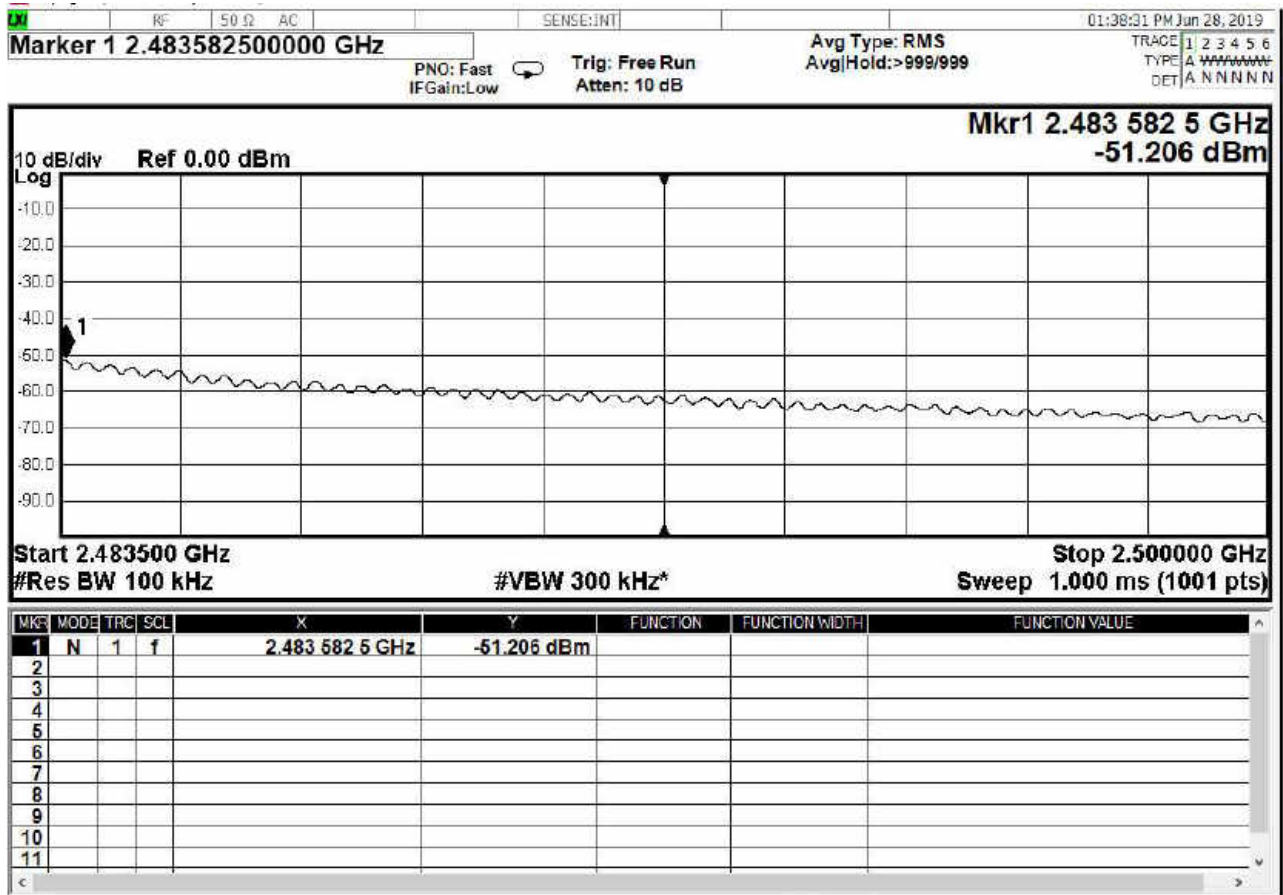


Figure 31 - Band-edge Measurement, High Channel, Restricted Frequency, Average

	Report Number:	R20181130-20-05	Rev	A
	Prepared for:	Garmin		

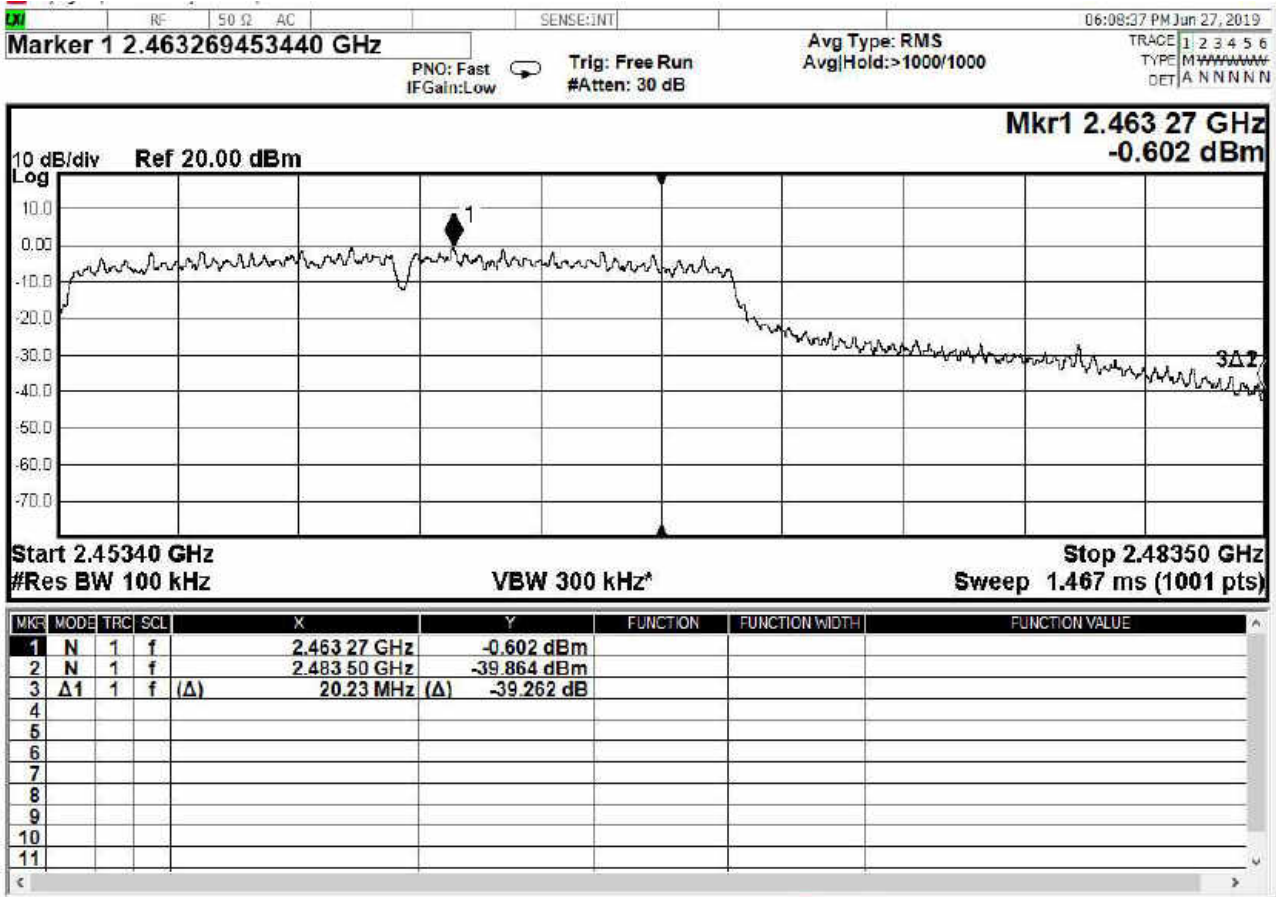


Figure 32 - Band-edge Measurement, High Channel, Fundamental, Average

	Report Number:	R20181130-20-05	Rev	A
	Prepared for:	Garmin		

Highest Out of Band Emissions, 802.11n

CHANNEL	Band edge /Measurement Frequency (MHz)	Highest out of band level dBm	Fundamental Level (dBm)	Delta	Min (dBc)	Result
1	2400.0 (Unrestricted, Peak)	-26.064	-0.706	25.358	20	PASS
1	2400.0 (Unrestricted, Average)	-24.083	-1.036	23.047	20	PASS
11	2483.5 (Unrestricted, Peak)	-38.282	-0.243	38.039	20	PASS
11	2483.5 (Unrestricted, Average)	-39.419	-0.65	38.769	20	PASS

CHANNEL	Band edge /Measurement Frequency (MHz)	Highest out of band level (dBm)	Corrected Emission Level (dBm)	Margin	Limit* (dBm)	Gain** (dBi)	Result
1	2390.0 (Restricted, Peak)	-39.596	-39.596	18.366	-21.23	0.00	PASS
1	2349.0 (Restricted, Average)	-54.005	-54.005	12.775	-41.23	0.00	PASS
11	2483.5 (Restricted, Peak)	-35.874	-35.874	14.644	-21.23	0.00	PASS
11	2483.5 (Restricted, Average)	-51.634	-51.634	10.404	-41.23	0.00	PASS

Corrected Emission level= Highest out of band level +Gain

Margin= Limit-Corrected Emission Level

*Limits from Part 15.209 in dBm **Antenna gain declared by the manufacturer

	Report Number:	R20181130-20-05	Rev	A
	Prepared for:	Garmin		

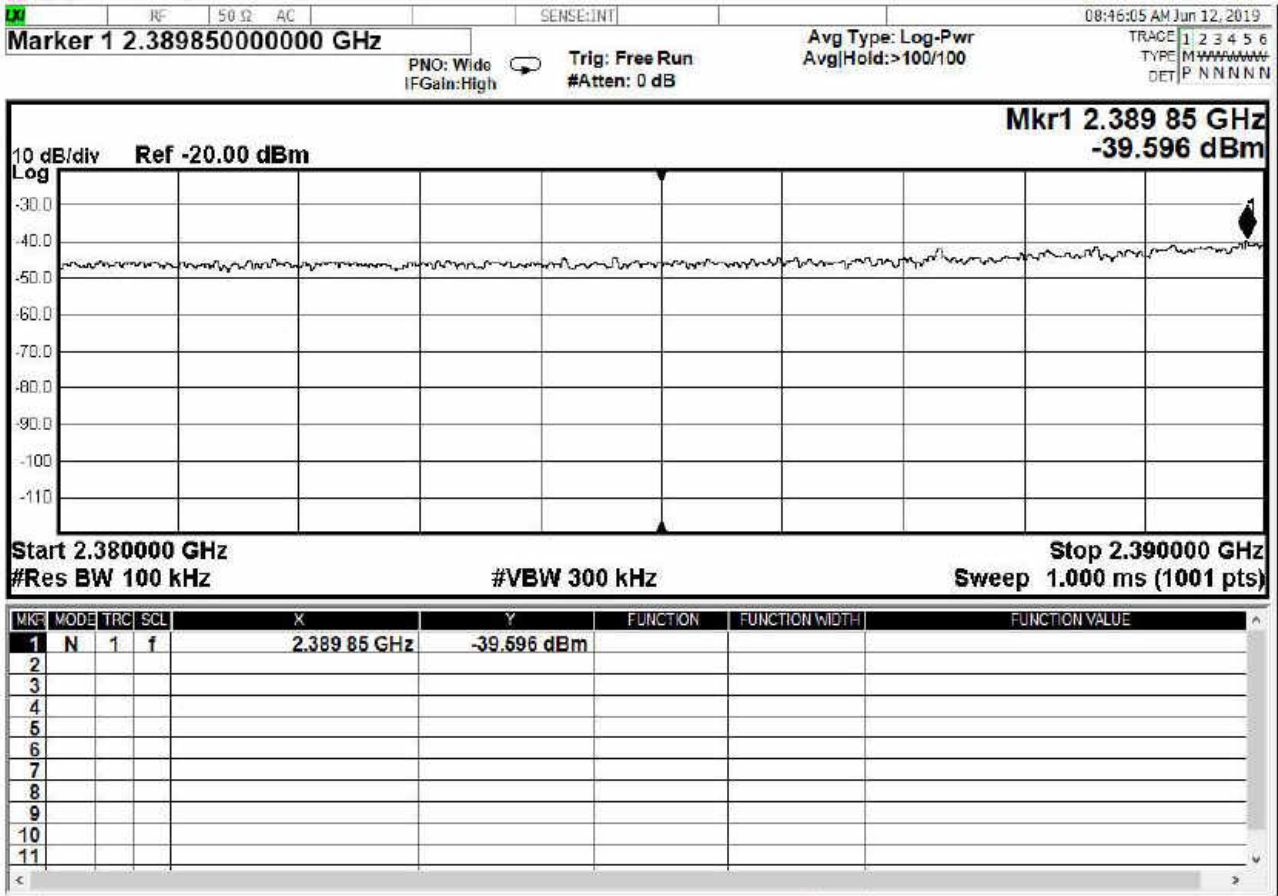


Figure 33 - Band-edge Measurement, Low Channel, Restricted Frequency, Peak

	Report Number:	R20181130-20-05	Rev	A
	Prepared for:	Garmin		

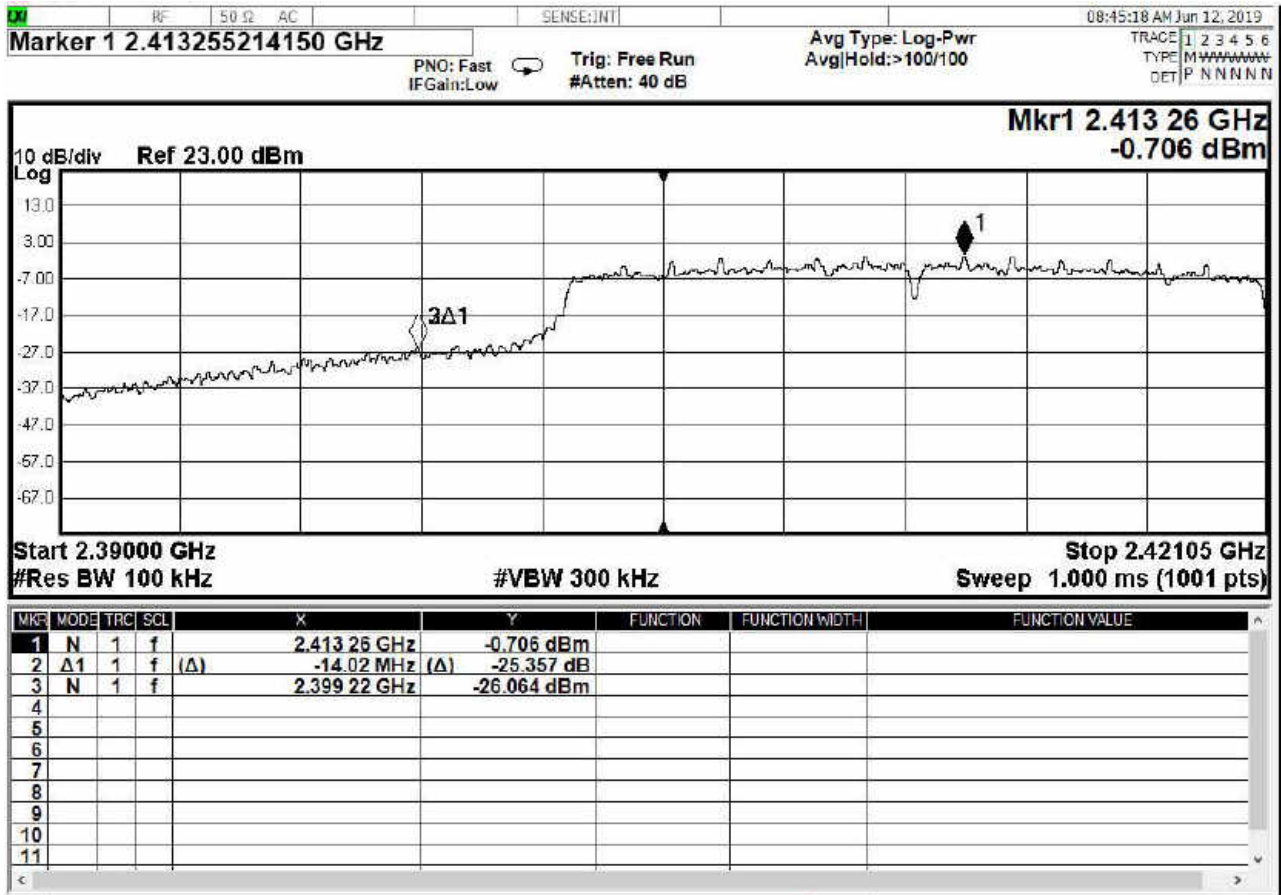


Figure 34 - Band-edge Measurement, Low Channel, Fundamental, Peak

	Report Number:	R20181130-20-05	Rev	A
	Prepared for:	Garmin		

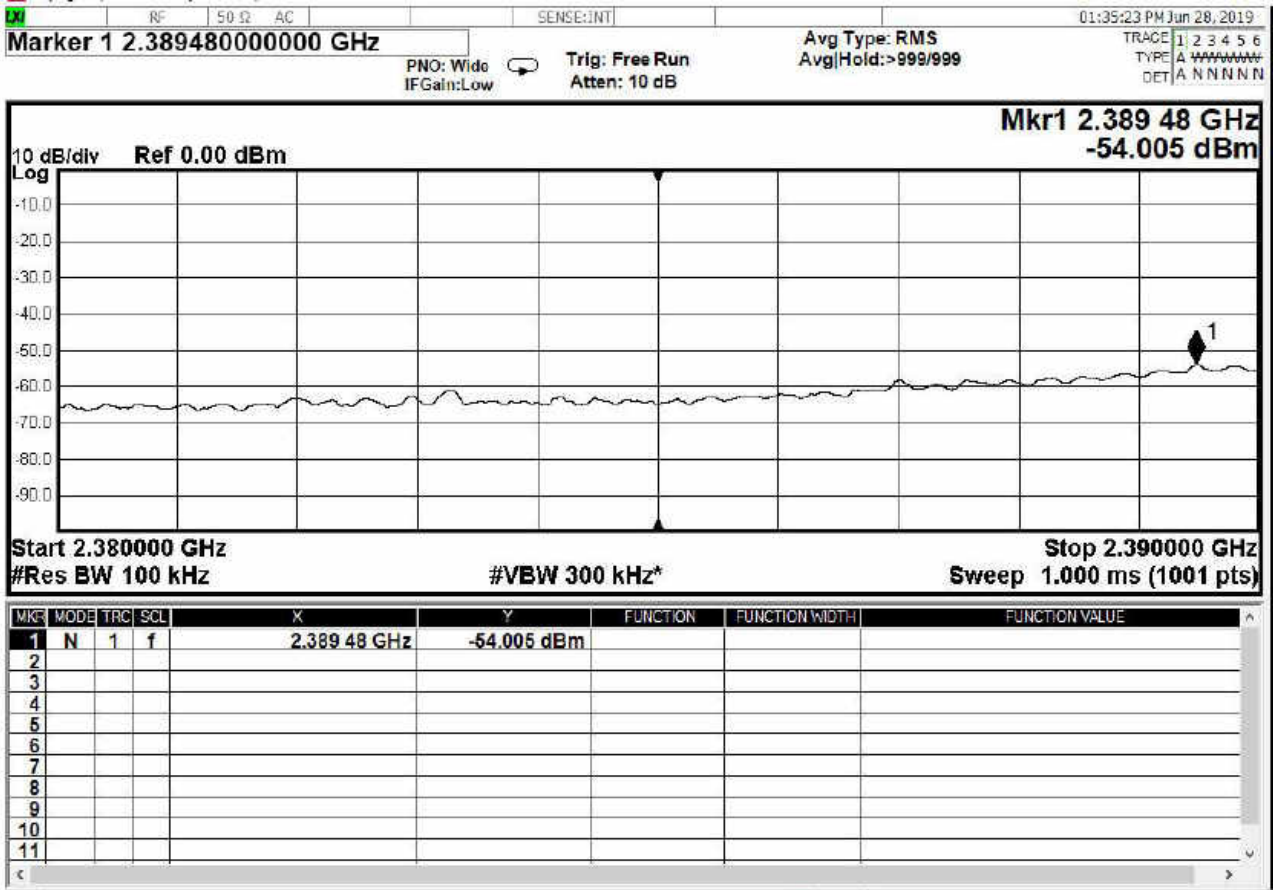


Figure 35 - Band-edge Measurement, Low Channel, Restricted Frequency, Average

	Report Number:	R20181130-20-05	Rev	A
	Prepared for:	Garmin		

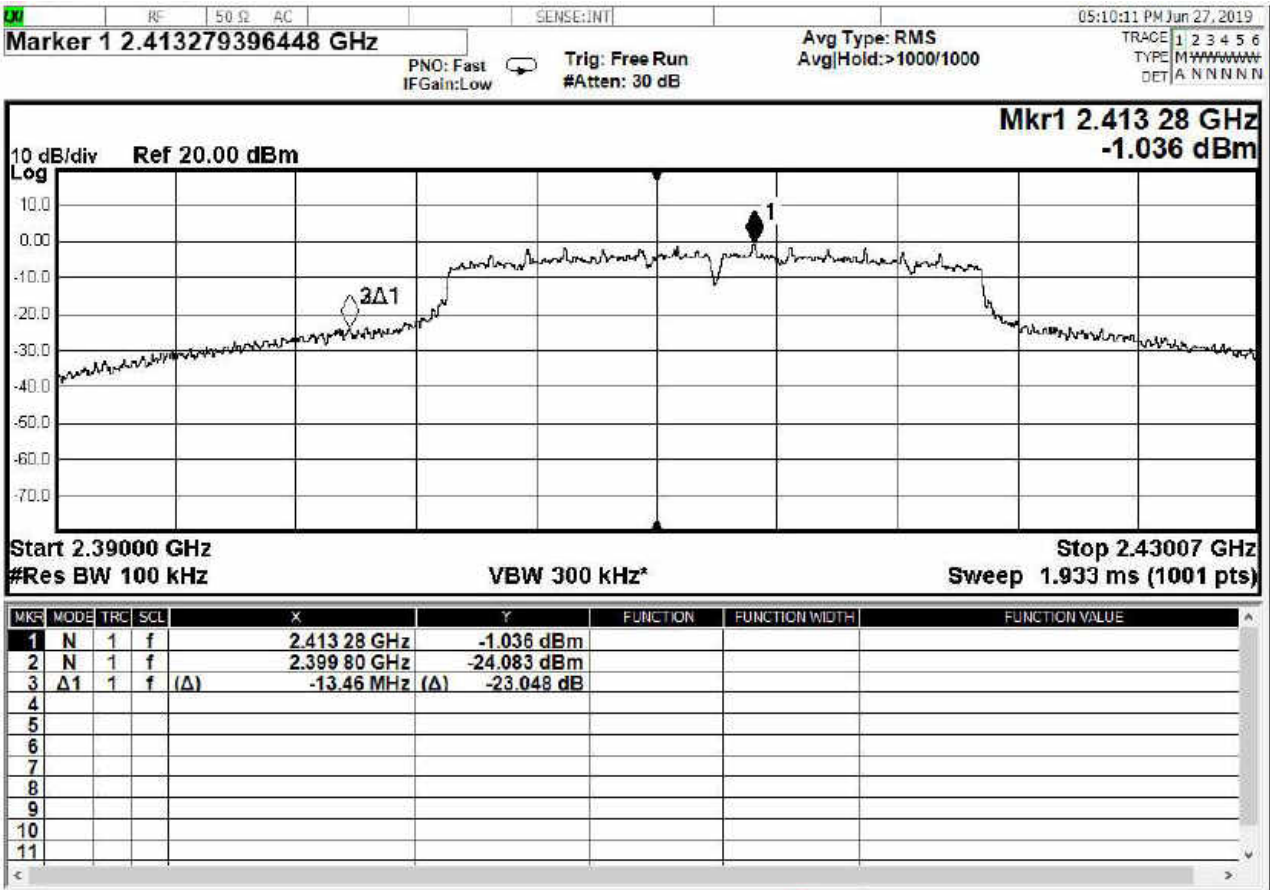


Figure 36 - Band-edge Measurement, Low Channel, Fundamental, Average

	Report Number:	R20181130-20-05	Rev	A
	Prepared for:	Garmin		

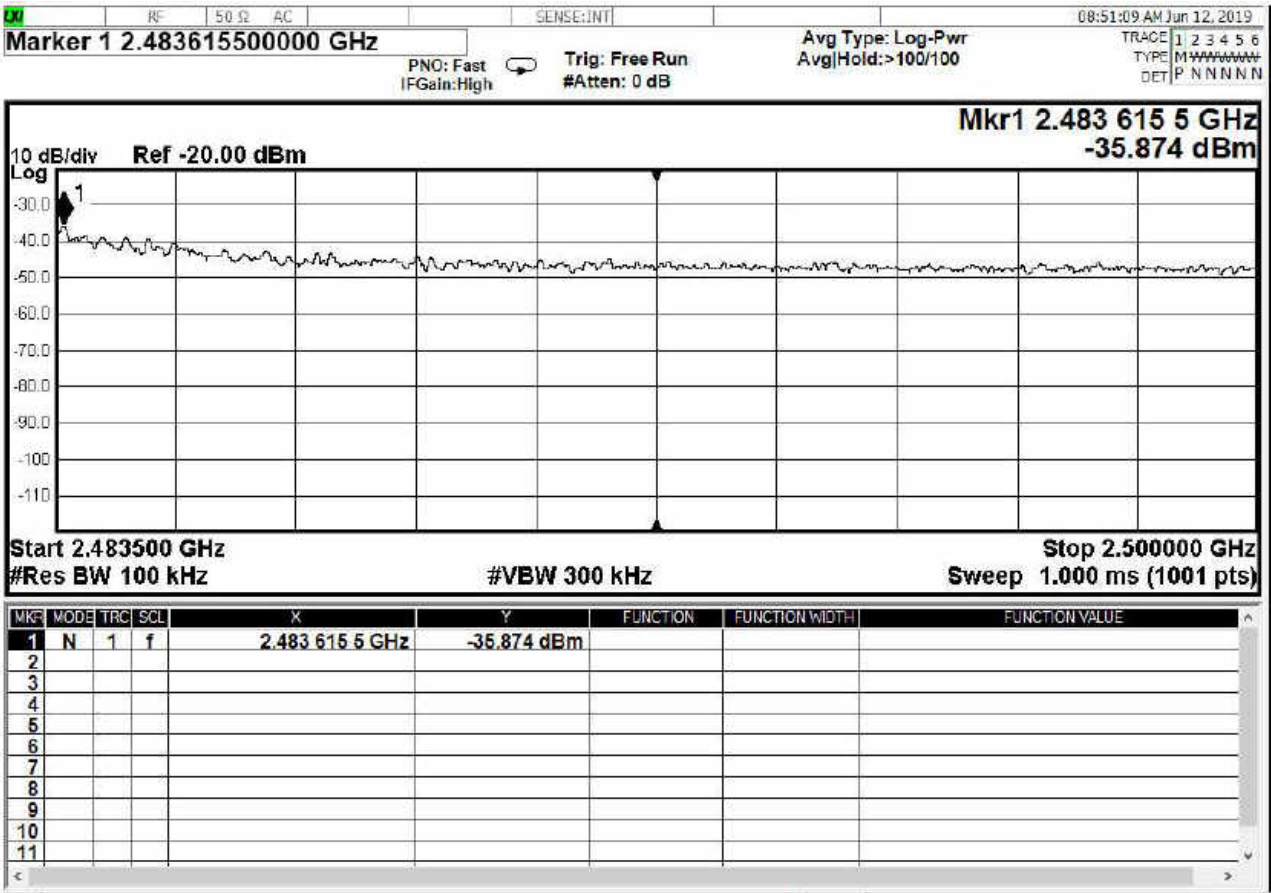


Figure 37 - Band-edge Measurement, High Channel, Restricted Frequency, Peak

	Report Number:	R20181130-20-05	Rev	A
	Prepared for:	Garmin		

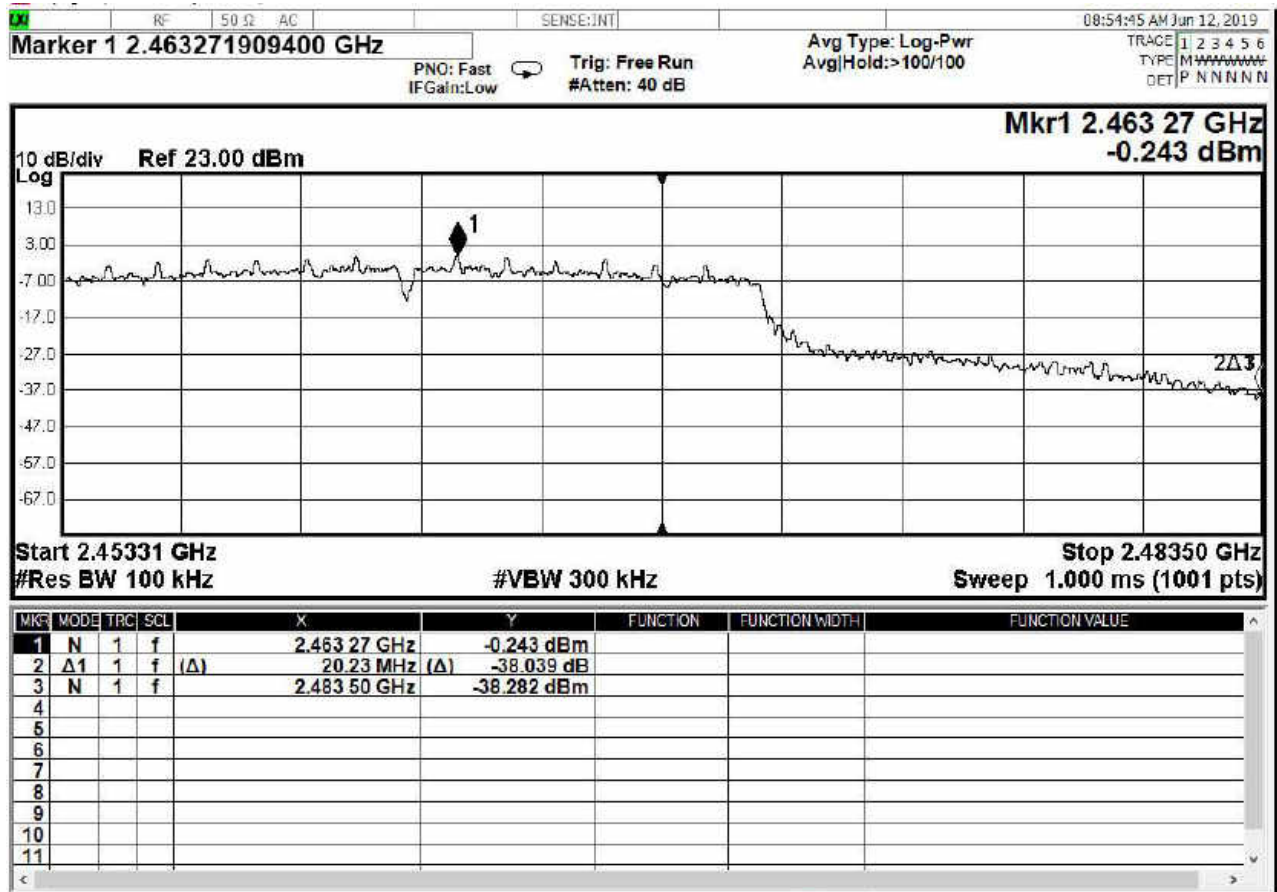


Figure 38 - Band-edge Measurement, High Channel, Fundamental, Peak

	Report Number:	R20181130-20-05	Rev	A
	Prepared for:	Garmin		

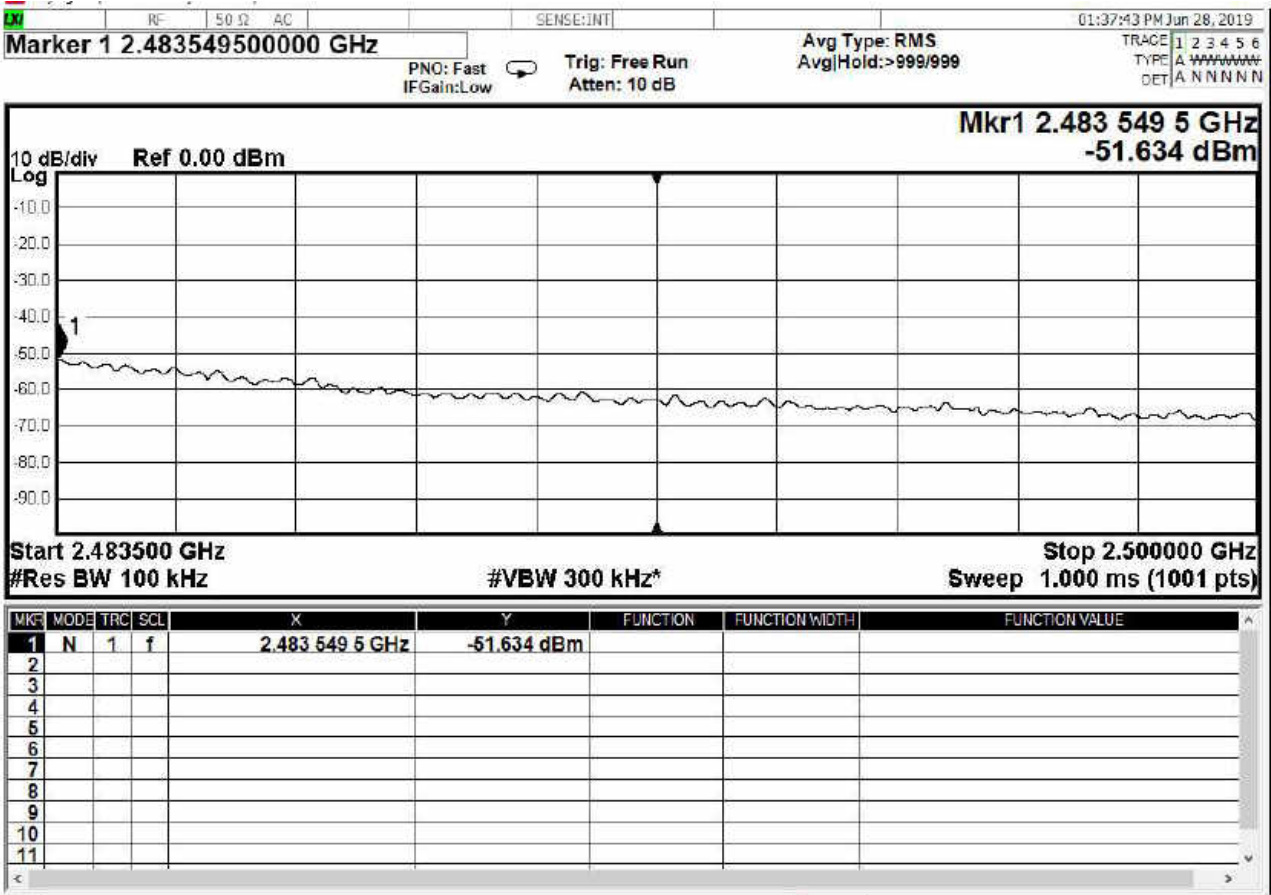


Figure 39 - Band-edge Measurement, High Channel, Restricted Frequency, Average

	Report Number:	R20181130-20-05	Rev	A
	Prepared for:	Garmin		

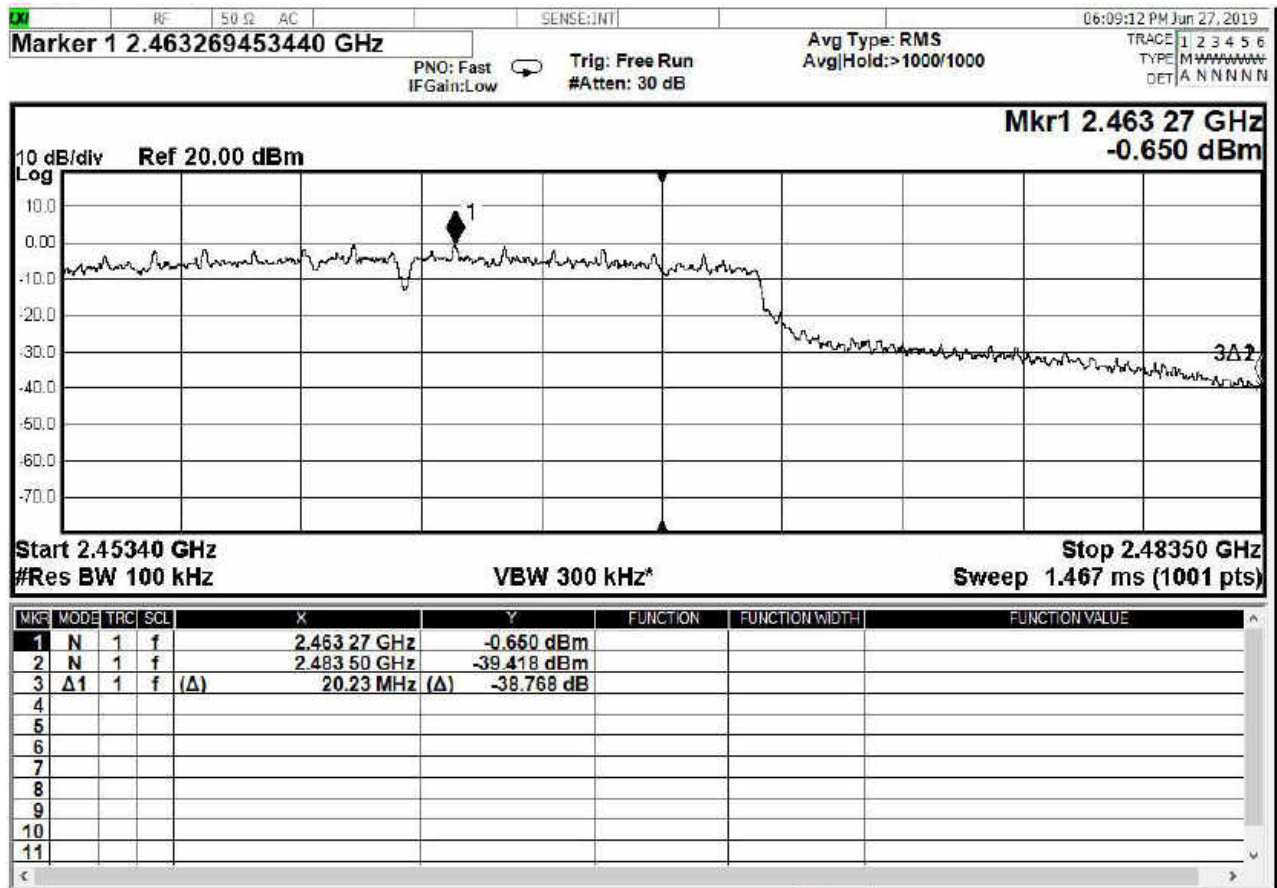


Figure 40 - Band-edge Measurement, High Channel, Fundamental, Average

	Report Number:	R20181130-20-05	Rev	A
	Prepared for:	Garmin		

4.6 POWER SPECTRAL DENSITY

Test Method: ANSI C63.10,

1. Section 11.10.2 "Method PKPSD (peak PSD)"

Limits of power measurements:

The maximum PSD allowed is 8 dBm.

Test procedures:

1. The EUT was connected to the spectrum analyzer directly with a low-loss shielded coaxial cable.
2. The resolution bandwidth was set to 3 kHz and the video bandwidth was set to 10 kHz to capture the signal. The analyzer used a peak detector in max hold mode.

Test setup:

The EUT was connected to the spectrum analyzer directly with a low-loss shielded coaxial cable on a bench top.

EUT operating conditions:

The EUT was powered by internal battery power unless specified and set to transmit continuously on the lowest frequency channel, highest frequency channel and one in the middle of its operating range.

Test results:

	Report Number:	R20181130-20-05	Rev	A
	Prepared for:	Garmin		

Power Spectral Density

CHANNEL	CHANNEL FREQUENCY (MHz)	WIFI Type	PEAK PSD(dBm)	Method	Limit (dBm)	RESULT
Low	2412	802.11b	-9.301	Conducted	8.00	PASS
Middle	2437	802.11b	-9.638	Conducted	8.00	PASS
High	2462	802.11b	-9.756	Conducted	8.00	PASS
Low	2412	802.11g	-14.642	Conducted	8.00	PASS
Middle	2437	802.11g	-12.739	Conducted	8.00	PASS
High	2462	802.11g	-14.794	Conducted	8.00	PASS
Low	2412	802.11n	-15.480	Conducted	8.00	PASS
Middle	2437	802.11n	-13.085	Conducted	8.00	PASS
High	2462	802.11n	-15.250	Conducted	8.00	PASS

	Report Number:	R20181130-20-05	Rev	A
	Prepared for:	Garmin		

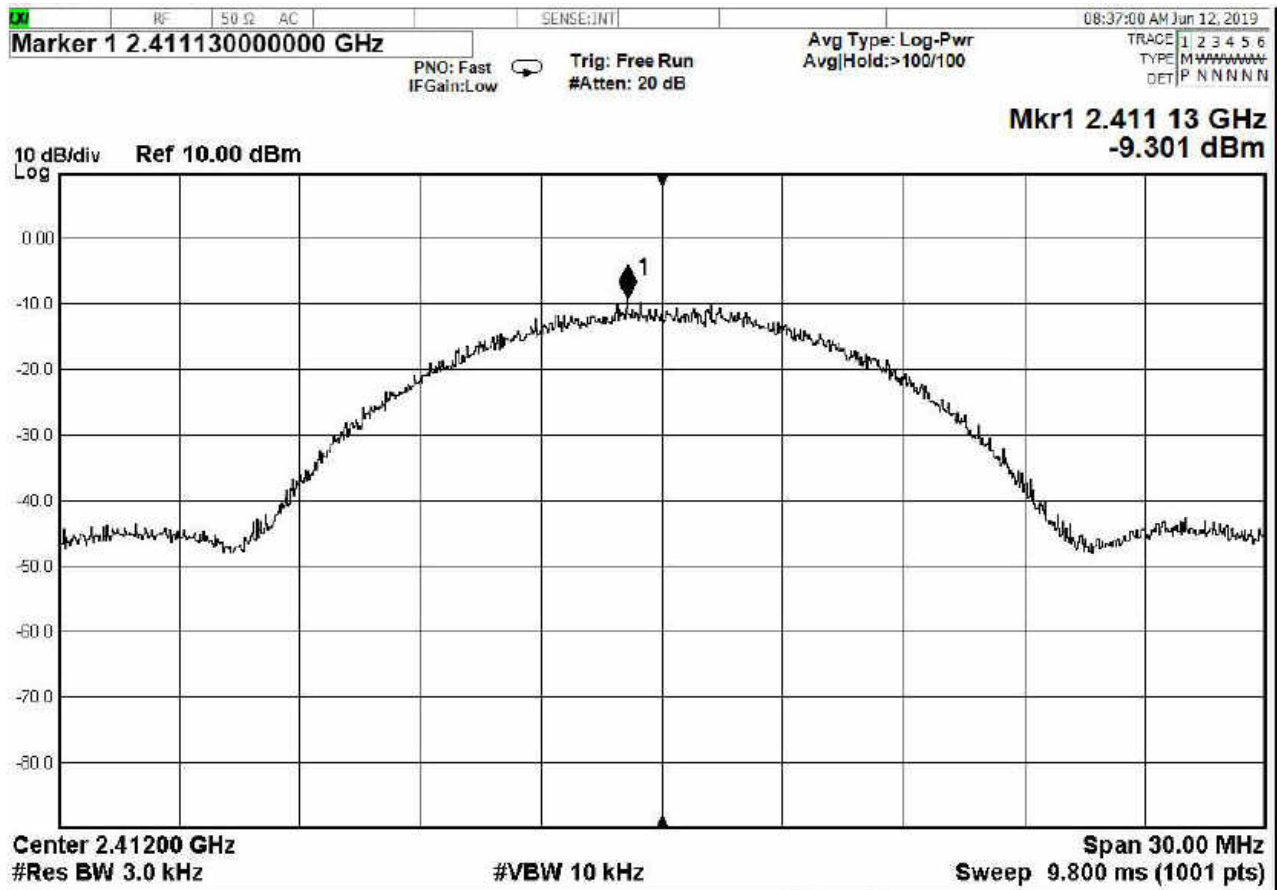


Figure 41 - Power Spectral Density, Low Channel, 802.11b

	Report Number:	R20181130-20-05	Rev	A
	Prepared for:	Garmin		



Figure 42 - Power Spectral Density, Mid Channel, 802.11b

	Report Number:	R20181130-20-05	Rev	A
	Prepared for:	Garmin		

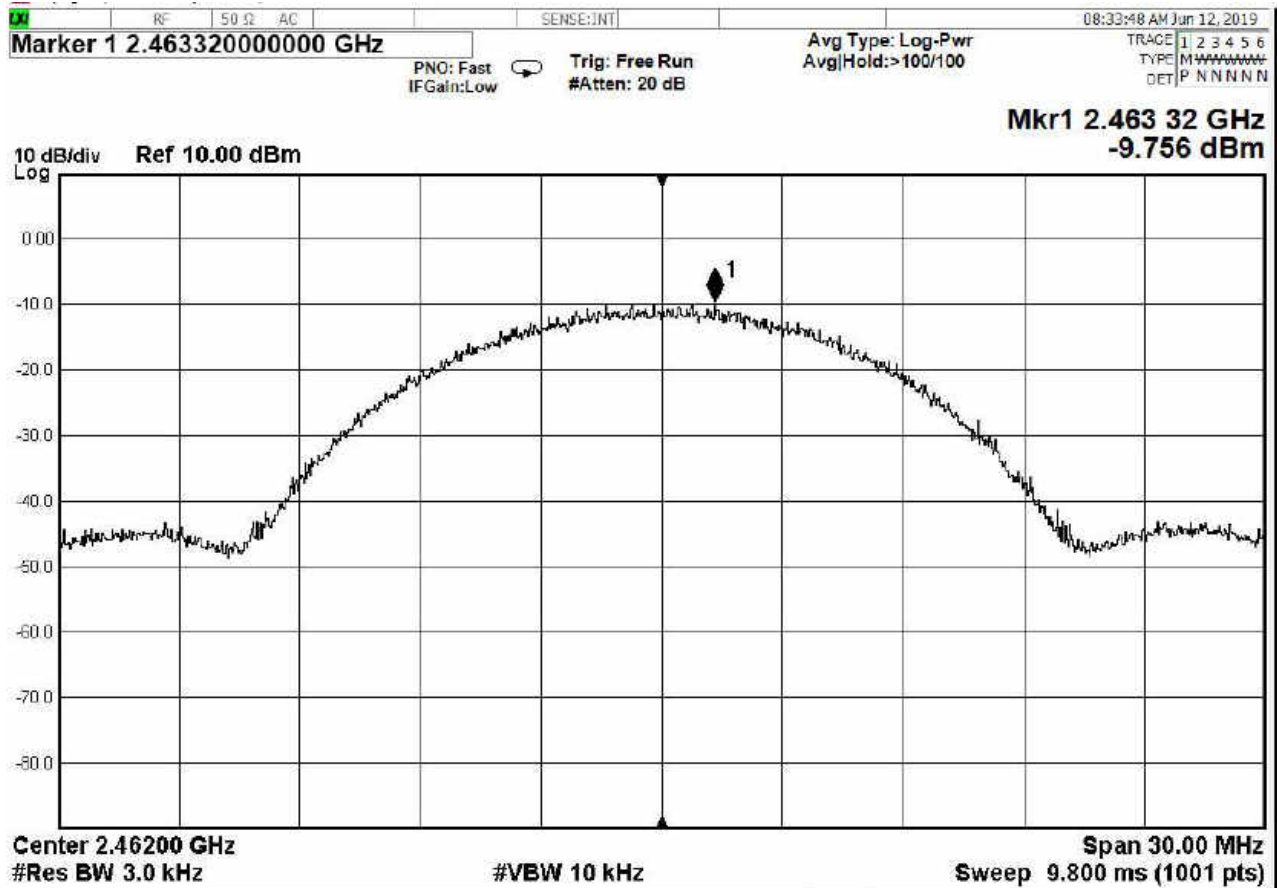


Figure 43 - Power Spectral Density, High Channel, 802.11b

	Report Number:	R20181130-20-05	Rev	A
	Prepared for:	Garmin		

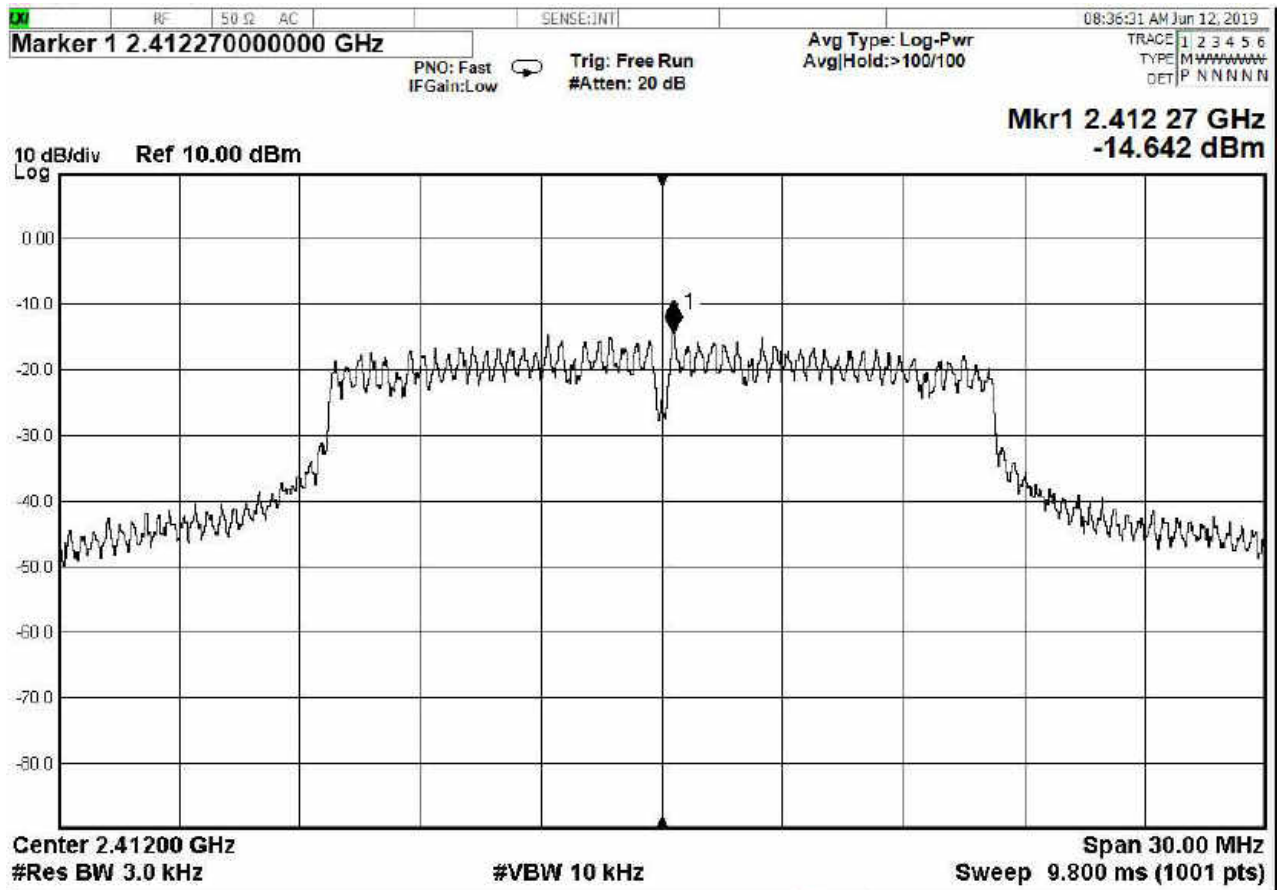


Figure 44 - Power Spectral Density, Low Channel, 802.11g

	Report Number:	R20181130-20-05	Rev	A
	Prepared for:	Garmin		

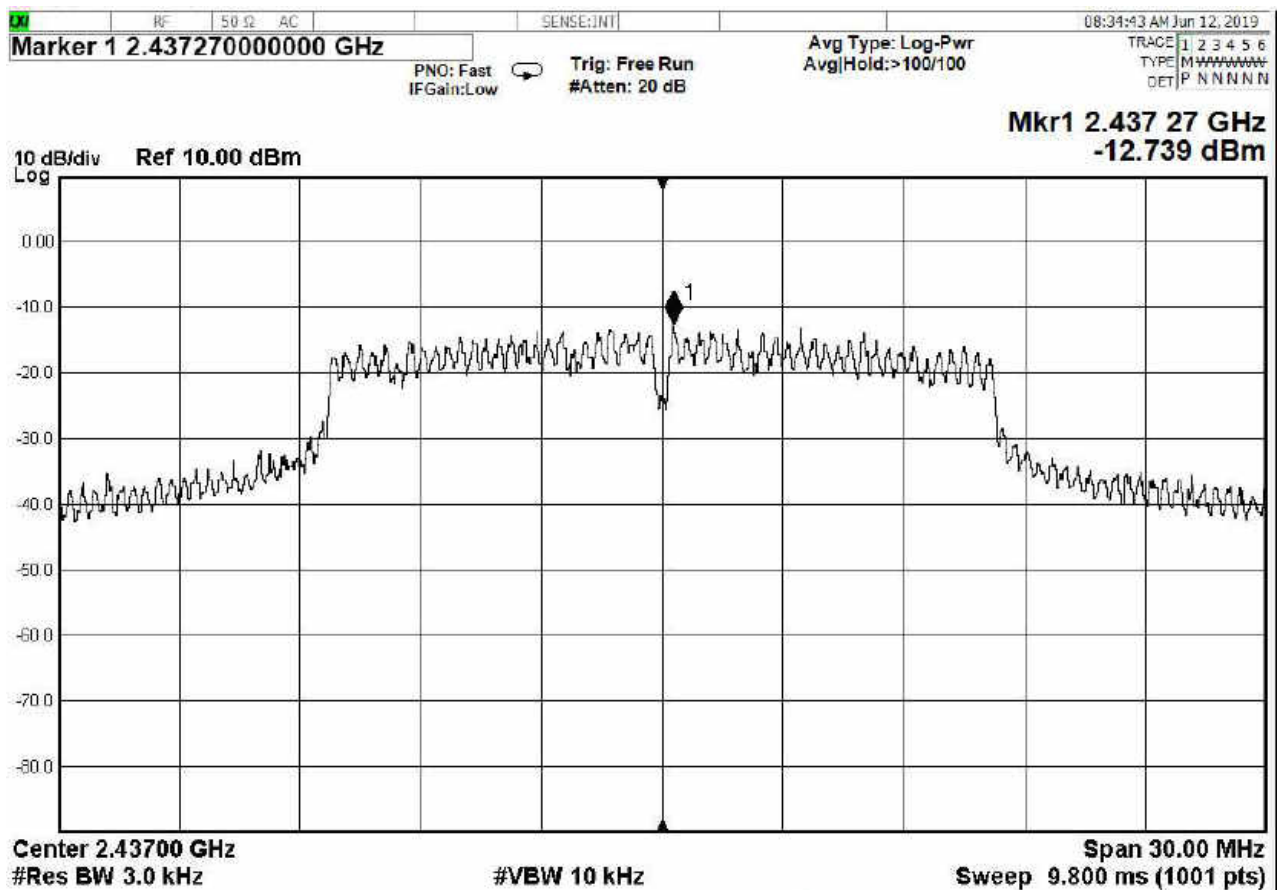


Figure 45 - Power Spectral Density, Mid Channel, 802.11g

	Report Number:	R20181130-20-05	Rev	A
	Prepared for:	Garmin		

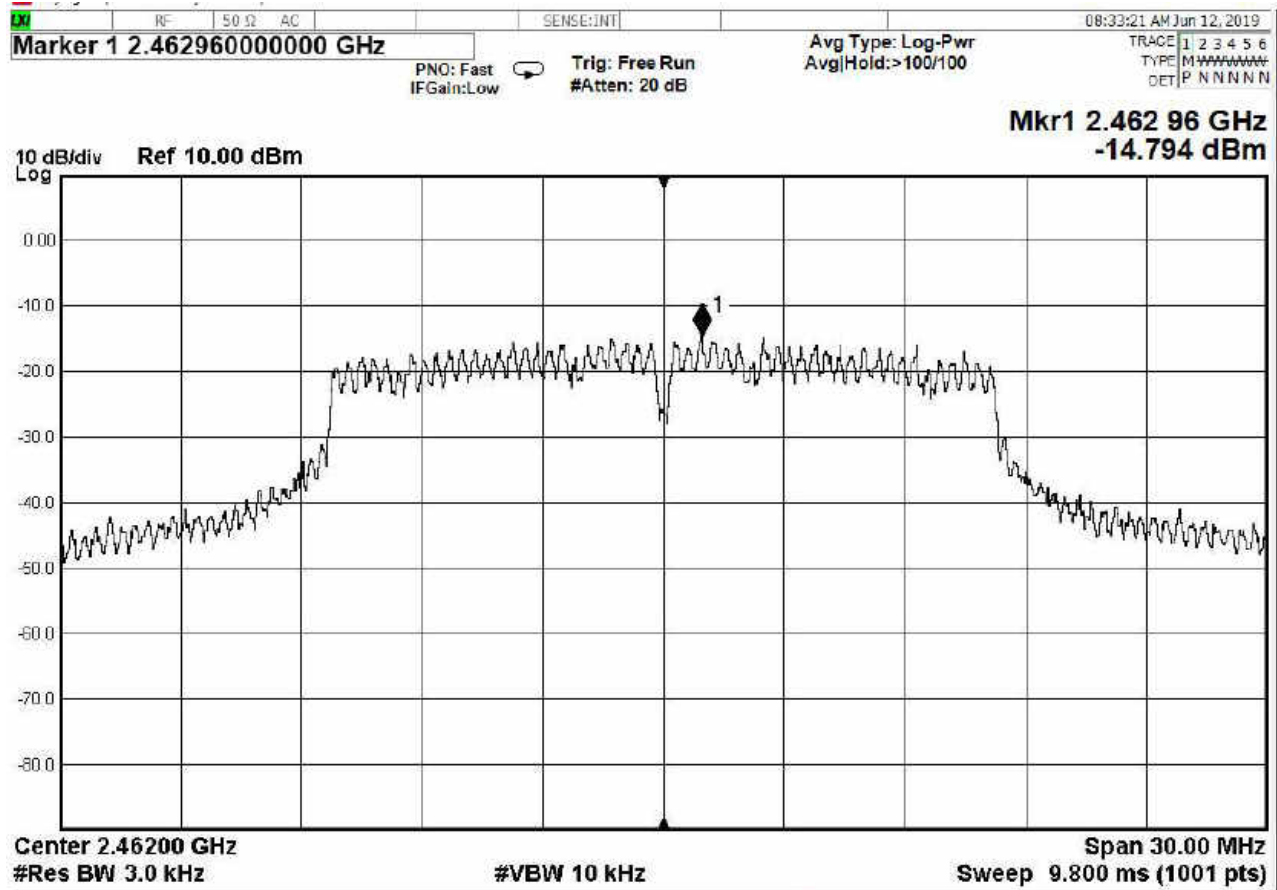


Figure 46 - Power Spectral Density, High Channel, 802.11g

	Report Number:	R20181130-20-05	Rev	A
	Prepared for:	Garmin		

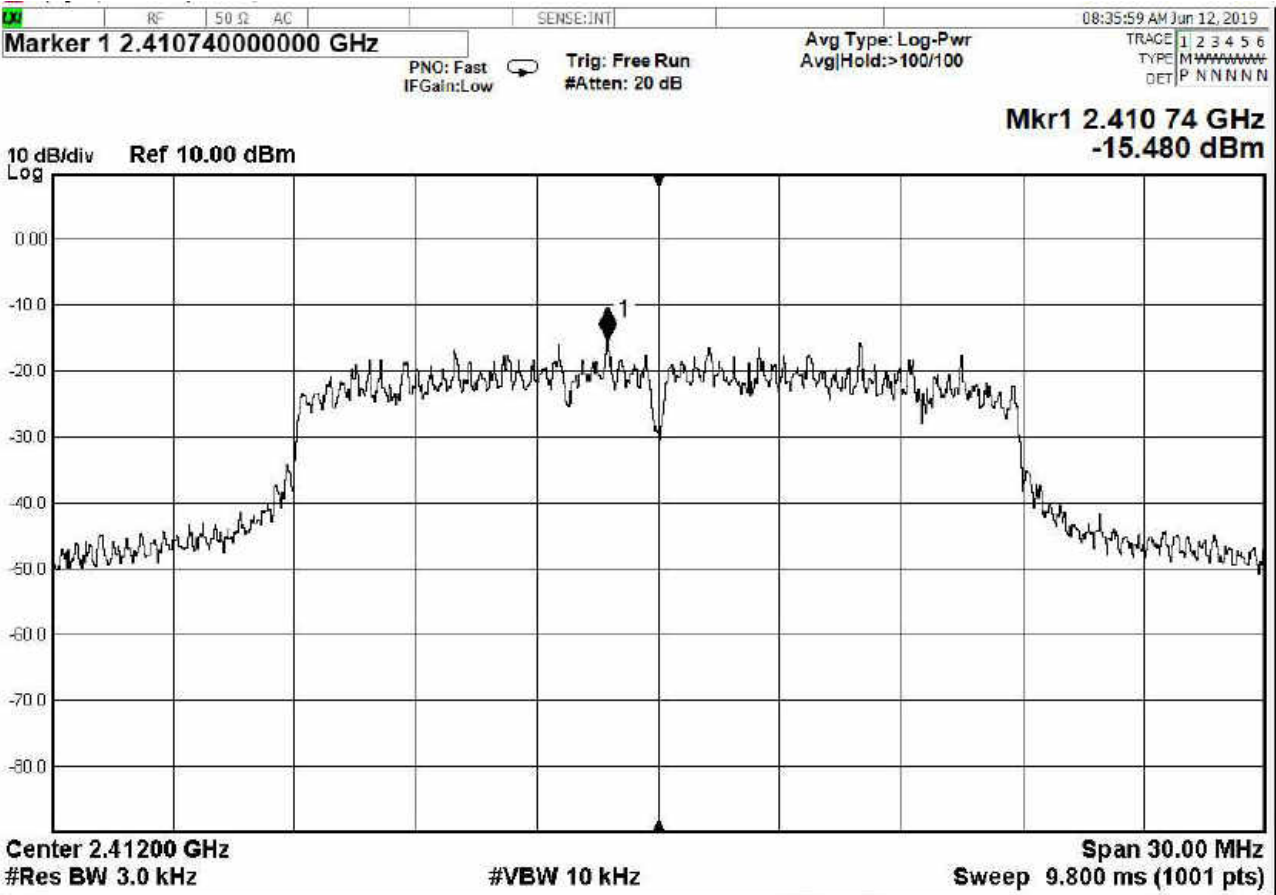


Figure 47 - Power Spectral Density, low Channel, 802.11n

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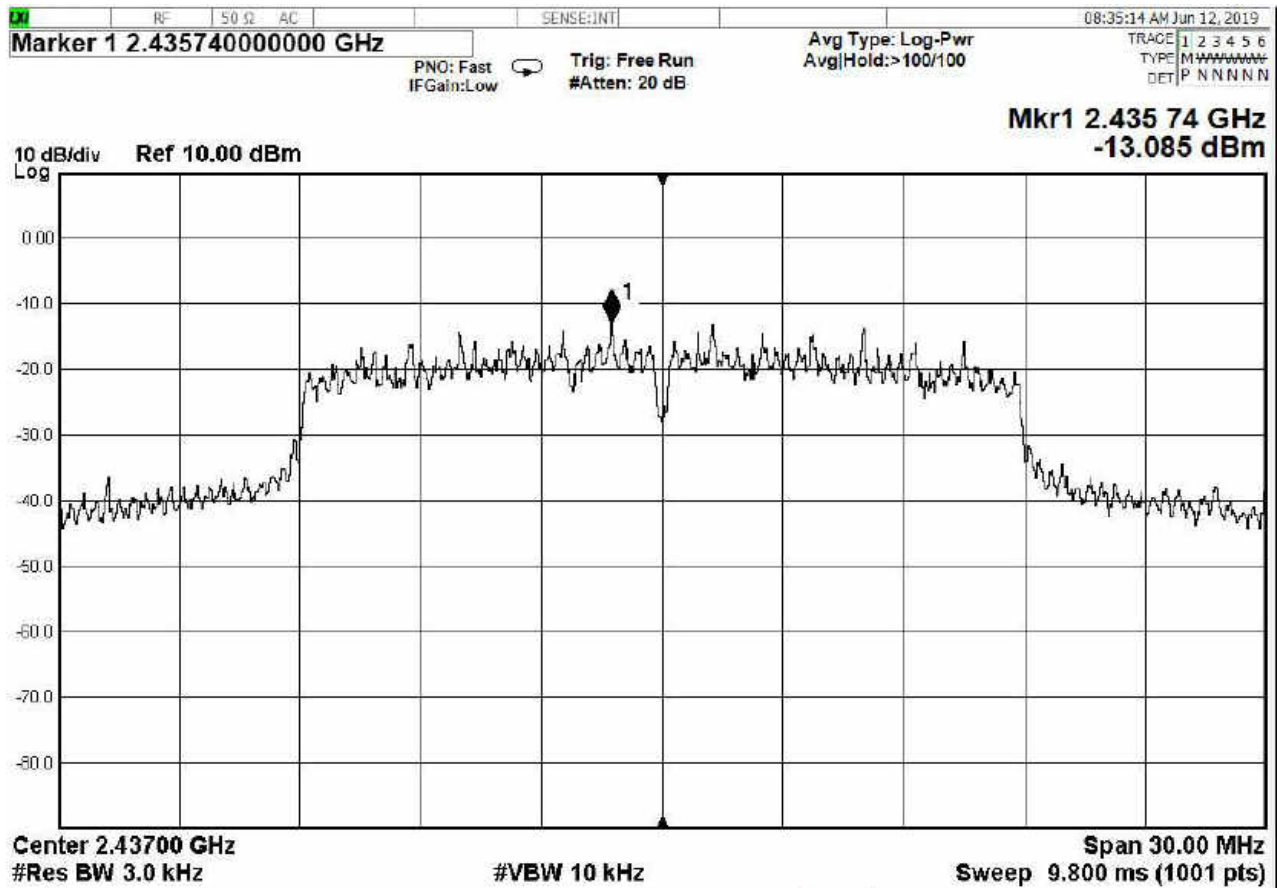


Figure 48 - Power Spectral Density, Mid Channel, 802.11n

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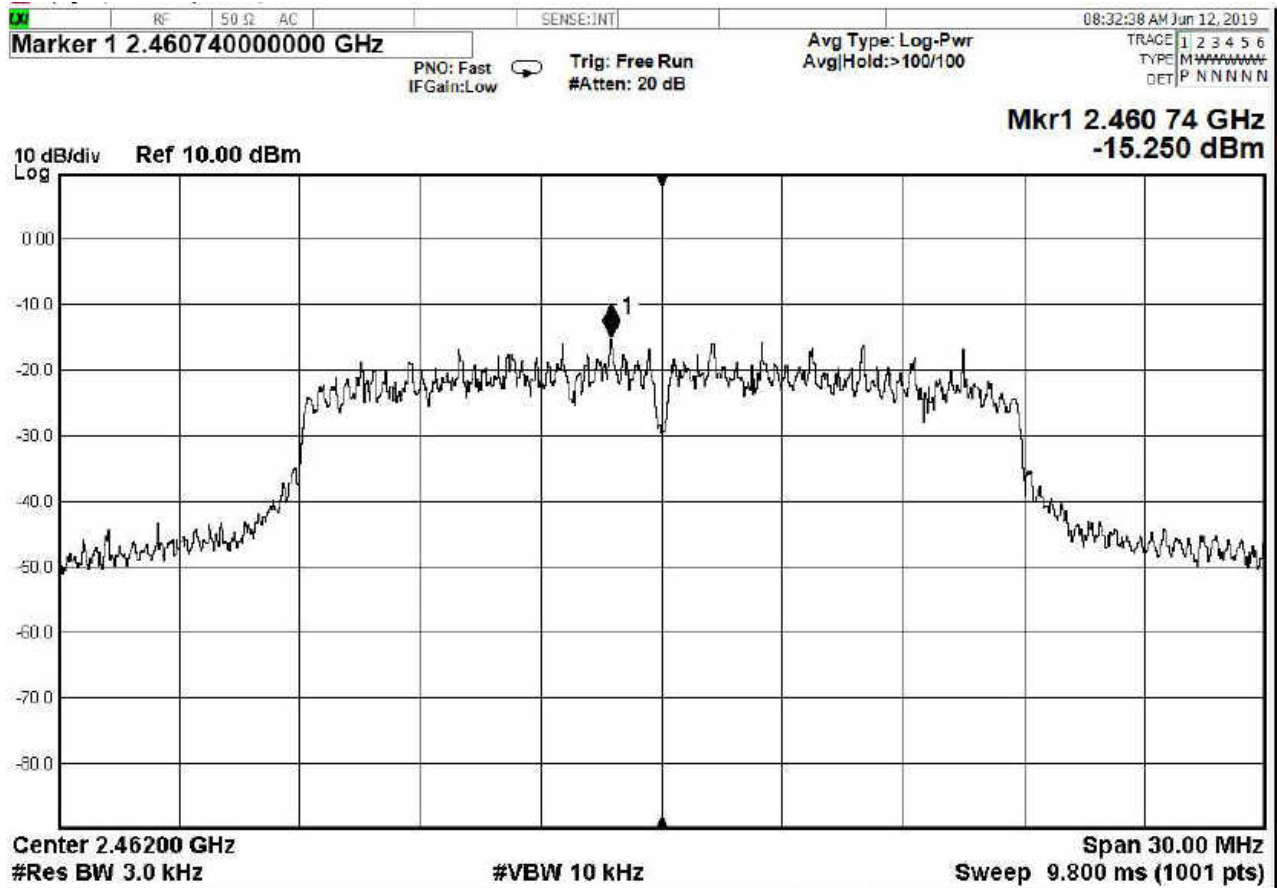


Figure 49 - Power Spectral Density, High Channel, 802.11n

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4.7 CONDUCTED AC MAINS EMISSIONS

Test Method: ANSI C63.10-2013, Section(s) 6.2

Limits for conducted emissions measurements:

FREQUENCY OF EMISSION (MHz)	CONDUCTED LIMIT (dB μ V)	
	Quasi-peak	Average
0.15-0.5	66 to 56	56 to 46
0.5-5	56	46
5-30	60	50

Notes:

1. The lower limit shall apply at the transition frequencies.
2. The limit decreases in line with the logarithm of the frequency in the range of 0.15 to 0.50 MHz
3. All emanations from a class A/B digital device or system, including any network of conductors and apparatus connected thereto, shall not exceed the level of field strengths specified above.

Test Procedures:

- a. The EUT was placed 0.8m above a ground reference plane and 0.4 meters from the conducting wall of a shielded room with EUT being connected to the power mains through a line impedance stabilization network (LISN). The LISN provides 50 ohm/ 50uH of coupling impedance for the measuring instrument.
- b. Both lines of the power mains connected to the EUT were checked for maximum conducted interference as well as the ground.
- c. The frequency range from 150 kHz to 30 MHz was searched. Emission levels over 10dB under the prescribed limits are not reported.
- d. Results were compared to the 15.207 limits.

Deviation from the test standard:

No deviation

EUT operating conditions:

The EUT was powered by 5 VDC unless specified and set to transmit continuously on the middle channel.

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Test Results:

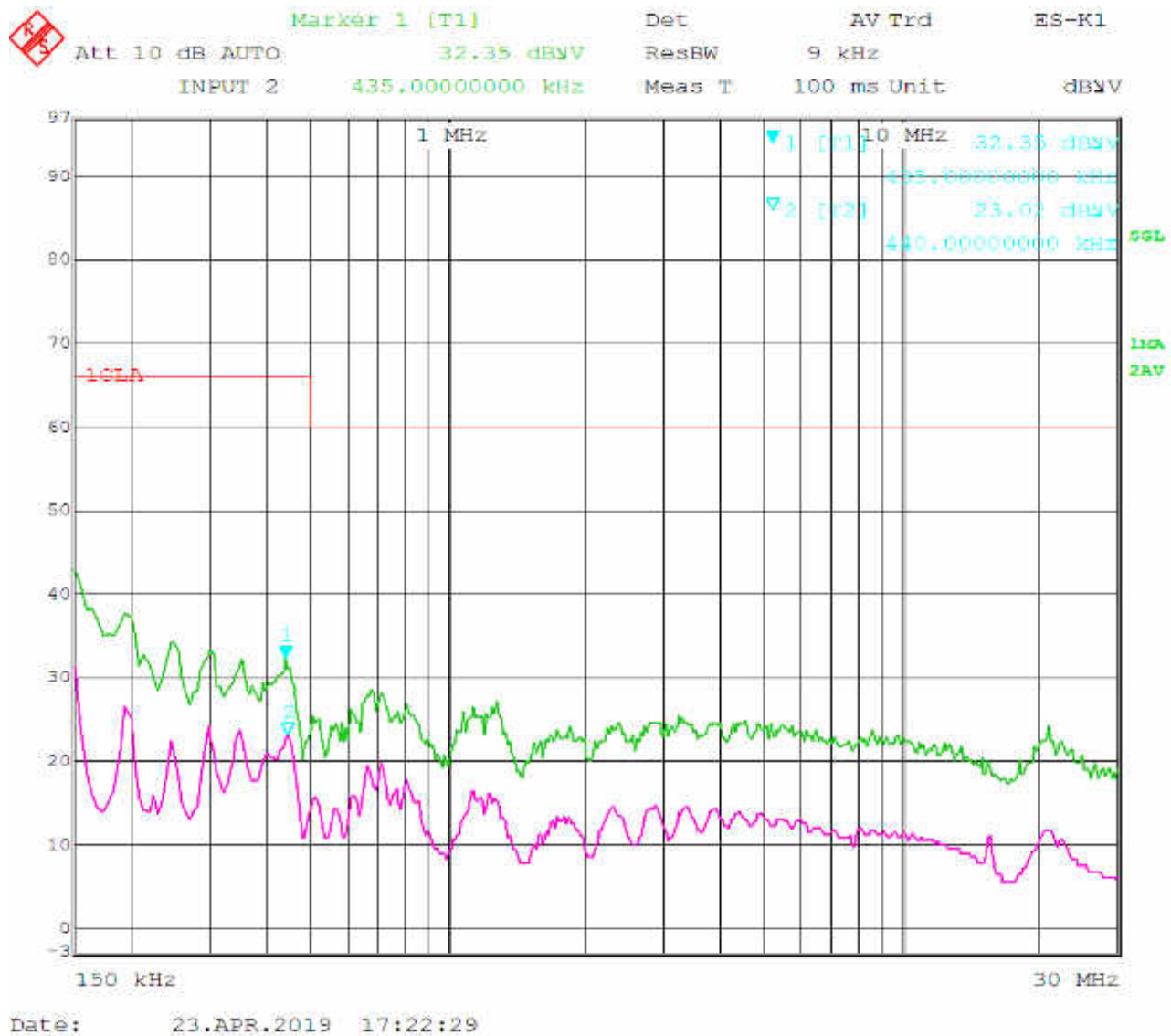


Figure 50 - Conducted Emissions Plot, L-F

All Measurements were found to be at least 10 dB below the limits.

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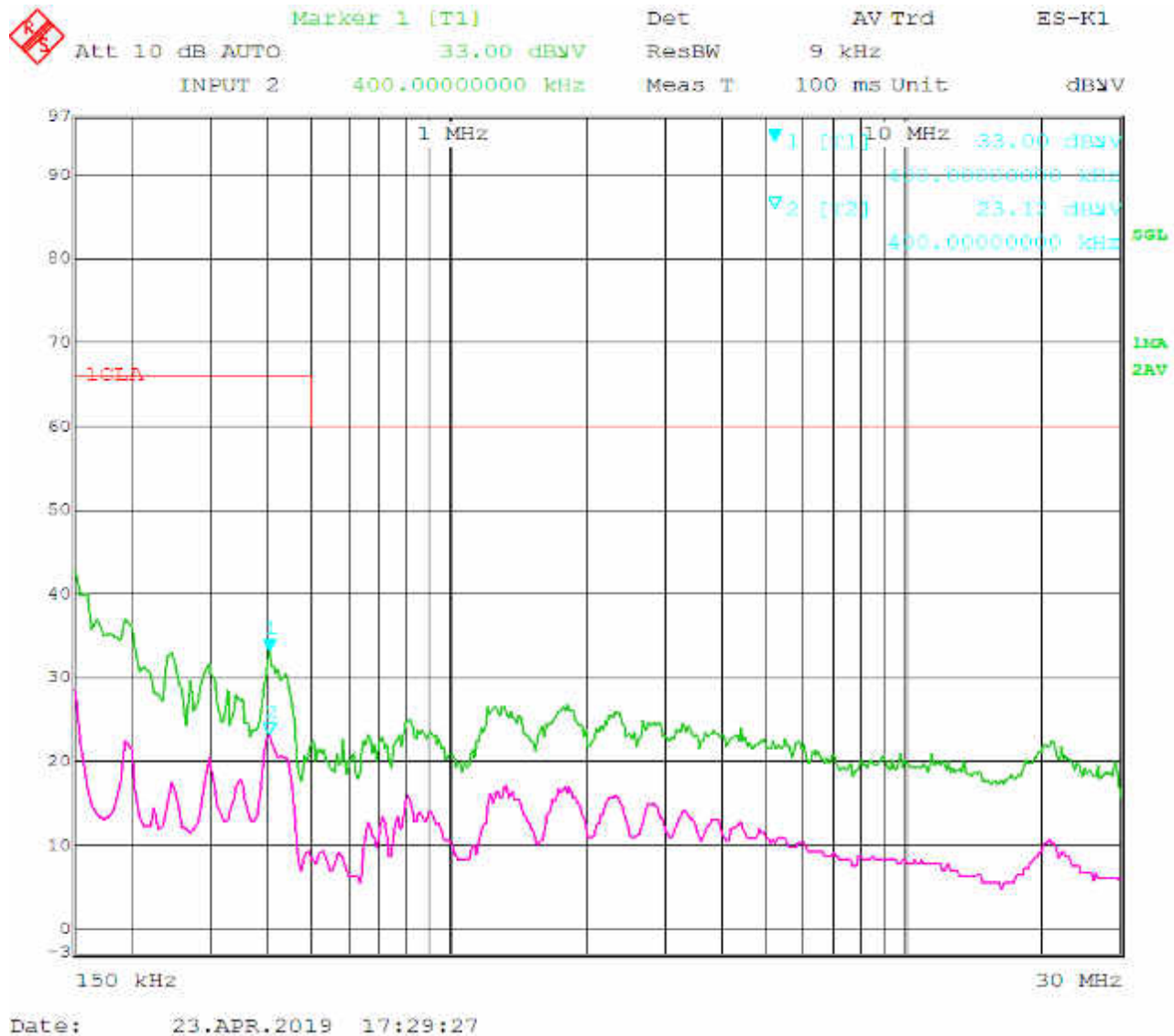


Figure 51 - Conducted Emissions Plot, L-G

All Measurements were found to be at least 10 dB below the limits.

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APPENDIX A: SAMPLE CALCULATION

Field Strength Calculation

The field strength is calculated by adding the Antenna Factor and Cable Factor, and subtracting the Amplifier Gain (if any) from the measured reading. The basic equation with a sample calculation is as follows:

$$FS = RA + AF - (-CF + AG) + AV$$

where FS = Field Strength

RA = Receiver Amplitude

AF = Antenna Factor

CF = Cable Attenuation Factor

AG = Amplifier Gain

AV = Averaging Factor (if applicable)

Assume a receiver reading of 55 dB μ V is obtained. The Antenna Factor of 12 and a Cable Factor of 1.1 is added. The Amplifier Gain of 20 dB is subtracted, giving a field strength of 48.1 dB μ V/m.

$$FS = 55 + 12 - (-1.1 + 20) + 0 = 48.1 \text{ dB}\mu\text{V/m}$$

The 48.1 dB μ V/m value can be mathematically converted to its corresponding level in μ V/m.

$$\text{Level in } \mu\text{V/m} = \text{Common Antilogarithm } [(48.1 \text{ dB}\mu\text{V/m})/20] = 254.1 \mu\text{V/m}$$

AV is calculated by the taking the $20 \cdot \log(T_{\text{on}}/100)$ where T_{on} is the maximum transmission time in any 100ms window.

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EIRP Calculations

In cases where direct antenna port measurement is not possible or would be inaccurate, output power is measured in EIRP. The maximum field strength is measured at a specified distance and the EIRP is calculated using the following equation;

$$EIRP (Watts) = [Field Strength (V/m) \times antenna distance (m)]^2 / 30$$

$$Power (watts) = 10^{[Power (dBm)/10]} / 1000$$

$$Voltage (dB\mu V) = Power (dBm) + 107 \text{ (for } 50\Omega \text{ measurement systems)}$$

$$Field Strength (V/m) = 10^{[Field Strength (dB\mu V/m) / 20]} / 10^6$$

$$Gain = 1 \text{ (numeric gain for isotropic radiator)}$$

Conversion from 3m field strength to EIRP (d=3):

$$EIRP = [FS(V/m) \times d^2]/30 = FS [0.3] \quad \text{for } d = 3$$

$$EIRP(dBm) = FS(dB\mu V/m) - 10(\log 10^9) + 10\log[0.3] = FS(dB\mu V/m) - 95.23$$

10log(10^9) is the conversion from micro to milli

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APPENDIX B – MEASUREMENT UNCERTAINTY

Where relevant, the following measurement uncertainty levels have been for tests performed in this test report:

Test	Frequency Range	Uncertainty Value (dB)
Radiated Emissions, 3m	30MHz - 1GHz	±3.82 dB
Radiated Emissions, 3m	1GHz - 18GHz	±4.44 dB
Emissions limits, conducted	30MHz – 18GHz	±3.30 dB
Antenna port conducted	9 kHz – 25 GHz	±0.50 dB

Values were calculated per CISPR 16-4-2:2011

Expanded uncertainty values are calculated to a confidence level of 95%.

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REPORT END

Amended
FCC/ISED DXX Test Report

Prepared for: Garmin International Inc.

Address: 1200 E. 151st Street
Olathe, Kansas, 66062, USA

Product: AA3556

Test Report No: R20190123-20-04A

Approved by:



Nic S. Johnson, NCE

Technical Manager

iNARTE Certified EMC Engineer #EMC-003337-NE

DATE: 13 August 2019

Total Pages: 56

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REVISION PAGE

Rev. No.	Date	Description
0	26 June 2019	Original – NJohnson Prepared by KVepuri/CFarrington
A	13 August 2019	Corrected header on Table 6, Added mid channels to spurious emissions. Includes NCEE Labs report R20190123-20-04 and its amendment in full.

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1.0 SUMMARY OF TEST RESULTS

The EUT has been tested according to the following specifications:

- (1) US Code of Federal Regulations, Title 47, Part 15
- (2) ISSED RSS-Gen, Issue 5
- (3) ISSED RSS-210, Issue 9

SUMMARY			
Requirement	Test Type and Limit	Result	Remark
FCC 15.203	Unique Antenna Requirement	Pass	PCB Antenna
FCC 15.35 RSS-Gen, 6.10	Duty cycle of pulsed emissions	N/A	Not required
NA	Maximum Peak Output Power	N/A	Informational Purpose Only
NA	Minimum Bandwidth	N/A	Informational Purpose Only
FCC 15.209 RSS-Gen, 7.1	Receiver Radiated Emissions	Pass	Meets the requirement of the limit.
FCC 15.209 RSS-Gen, 8.9 RSS-210 A1.2 FCC 15.249(a)	Transmitter Radiated Emissions	Pass	Meets the requirement of the limit.
FCC 15.209, 15.205, 15.249(d) RSS-Gen, 8.9 RSS-210, 5.5	Band Edge Measurement	Pass	Meets the requirement of the limit.
FCC 15.207 RSS-Gen. 8.8	Conducted AC Emissions	Pass	Meets the requirement of the limit.



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2.0 EUT DESCRIPTION

2.1 EQUIPMENT UNDER TEST

Summary

The Equipment Under Test (EUT) was a battery powered GFSK, GMSK and GFSK (BT BR) transceiver manufactured by GARMIN inc.

EUT	AA3556
EUT Received	10 June 2019
EUT Tested	11 June 2019- 26 June 2019
Unit ID/ Serial No.	3994474026 (used for radiated tests); 3994474016 (used for conducted tests)
Operating Band	2400 – 2483.5 MHz
Device Type	GFSK, GMSK, GFSK (BT BR) transceiver
Power Supply	Internal Battery/ Charger: Garmin (Phi Hong) MN: PSAI10R-050Q

NOTE: For more detailed features description, please refer to the manufacturer's specifications or user's manual.



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2.2 DESCRIPTION OF TEST MODES

The EUT operates on, and was tested at the frequencies below:

Channel	Frequency
Low	2402 MHz
Mid	2440 MHz
High	2480 MHz

These are the only three representative channels tested in the frequency range according to FCC Part 15.31 and RSS-Gen Table A1. See the operational description for a list of all channel frequency and designations.

This EUT was set to transmit in a worse-case scenario with modulation on. The manufacturer modified the unit to transmit continuously on the lowest, middle and highest frequency channels.

The EUT was tested on both battery and external USB.

2.3 DESCRIPTION OF SUPPORT UNITS

None

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3.0 LABORATORY DESCRIPTION

3.1 LABORATORY DESCRIPTION

All testing was performed at the following Facility:

The Nebraska Center for Excellence in Electronics (NCEE Labs)
 4740 Discovery Drive
 Lincoln, NE 68521

A2LA Certificate Number:	1953.01
FCC Accredited Test Site Designation No:	US1060
Industry Canada Test Site Registration No:	4294A-1
NCC CAB Identification No:	US0177

Environmental conditions varied slightly throughout the tests:

Relative humidity of $35 \pm 4\%$
 Temperature of $22 \pm 3^\circ$ Celsius



3.2 TEST PERSONNEL

No.	PERSONNEL	TITLE	ROLE
1	Nic Johnson	Technical Manager	Review/editing
2	Karthik Vepuri	Test Engineer	Testing and report
3	Caleb Farrington	Test Technician	Testing and report

Notes:

All personnel are permanent staff members of NCEE Labs. No testing or review was sub-contracted or performed by sub-contracted personnel.

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3.3 TEST EQUIPMENT

DESCRIPTION AND MANUFACTURER	MODEL NO.	SERIAL NO.	LAST CALIBRATION DATE	CALIBRATION DUE DATE
Rohde & Schwarz Test Receiver	ES126	100037	30 Jan 2018	30 Jan 2020
Keysight EXA Signal Analyzer	N9010A	MY56070862	14 Dec 2018	14 Dec 2020
EMCO Biconilog Antenna	3142B	1647	02 Aug 2017	02 Aug 2019
EMCO Horn Antenna	3115	6416	26 Jan 2018	26 Jan 2020
EMCO Horn Antenna	3116	2576	31 Jan 2018	31 Jan 2020
Rohde & Schwarz Preamplifier	TS-PR18	3545700803	09 Mar 2018*	09 Mar 2020*
Trilithic High Pass Filter	6HC330	23042	09 Mar 2018*	09 Mar 2020*
Rohde & Schwarz LISN	ESH3-Z5	836679/010	26 Jul 2018	26 Jul 2019
RF Cable (preamplifier to antenna)	MFR-57500	01-07-002	09 Mar 2018*	09 Mar 2020*
RF Cable (antenna to 10m chamber bulkhead)	FSCM 64639	01E3872	09 Mar 2018*	09 Mar 2020*
RF Cable (10m chamber bulkhead to control room bulkhead)	FSCM 64639	01E3874	09 Mar 2018*	09 Mar 2020*
RF Cable (Control room bulkhead to RF switch)	FSCM 64639	01E3871	09 Mar 2018*	09 Mar 2020*
RF Cable (RF switch to test receiver)	FSCM 64639	01F1206	09 Mar 2018*	09 Mar 2020*
RF switch – Rohde and Schwarz	TS-RSP	1113.5503.14	09 Mar 2018*	09 Mar 2020*
N connector bulkhead (10m chamber)	PE9128	NCEEBH1	09 Mar 2018*	09 Mar 2020*
N connector bulkhead (control room)	PE9128	NCEEBH2	09 Mar 2018*	09 Mar 2020*

*Internal Characterization

Notes:

All equipment is owned by NCEE Labs and stored permanently at NCEE Labs facilities.



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4.0 DETAILED RESULTS

4.1 DUTY CYCLE

Test Method: NA

4.2 PEAK OUTPUT POWER

Test Method: N/A

For Informational Purposes only

Test procedures:

1. The EUT was connected to the spectrum analyzer directly with a low-loss shielded coaxial cable
2. The resolution bandwidth was set to 10 MHz and the video bandwidth was set to 10 MHz to capture the signal. The analyzer used a peak detector in max hold mode.

Deviations from test standard:

No deviation.

Test setup:

The field strength was measured by connecting the EUT directly to the spectrum analyzer. See Section 4.2.

EUT operating conditions:

The EUT was powered by 5 VDC unless specified and set to transmit continuously on the lowest frequency channel, highest frequency channel and one in the middle of its operating range. EUT was set to transmit in GMSK and GFSK.

Test results:

Peak Output Power

CHANNEL	CHANNEL FREQUENCY (MHz)	PEAK OUTPUT POWER (dBm)	PEAK OUTPUT POWER (mW)	Method	Transmitter
1	2402	-2.868	0.517	Conducted	GMSK
2	2440	-0.175	0.961	Conducted	GMSK
3	2480	2.238	1.674	Conducted	GMSK
1	2402	-1.705	0.675	Conducted	GFSK
2	2440	0.099	1.023	Conducted	GFSK
3	2480	2.294	1.696	Conducted	GFSK
1	2402	-1.697	0.677	Conducted	GFSK (BTBR)
2	2440	0.008	1.002	Conducted	GFSK (BTBR)
3	2480	2.244	1.676	Conducted	GFSK (BTBR)

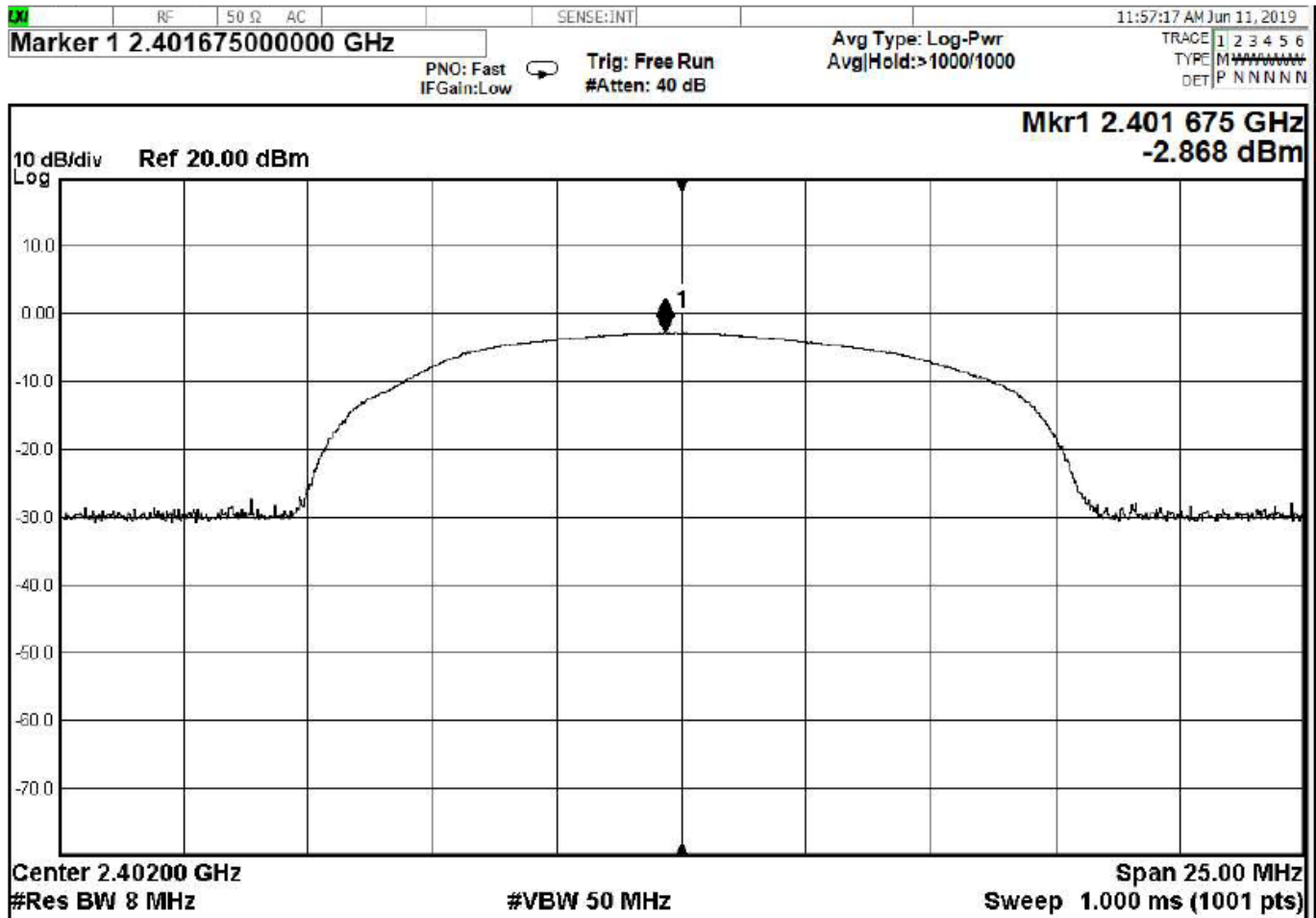


Figure 1 – Output Power, Low Channel, GMSK

Output power -2.868 dBm

Cable loss was less than 0.1 dB and not included

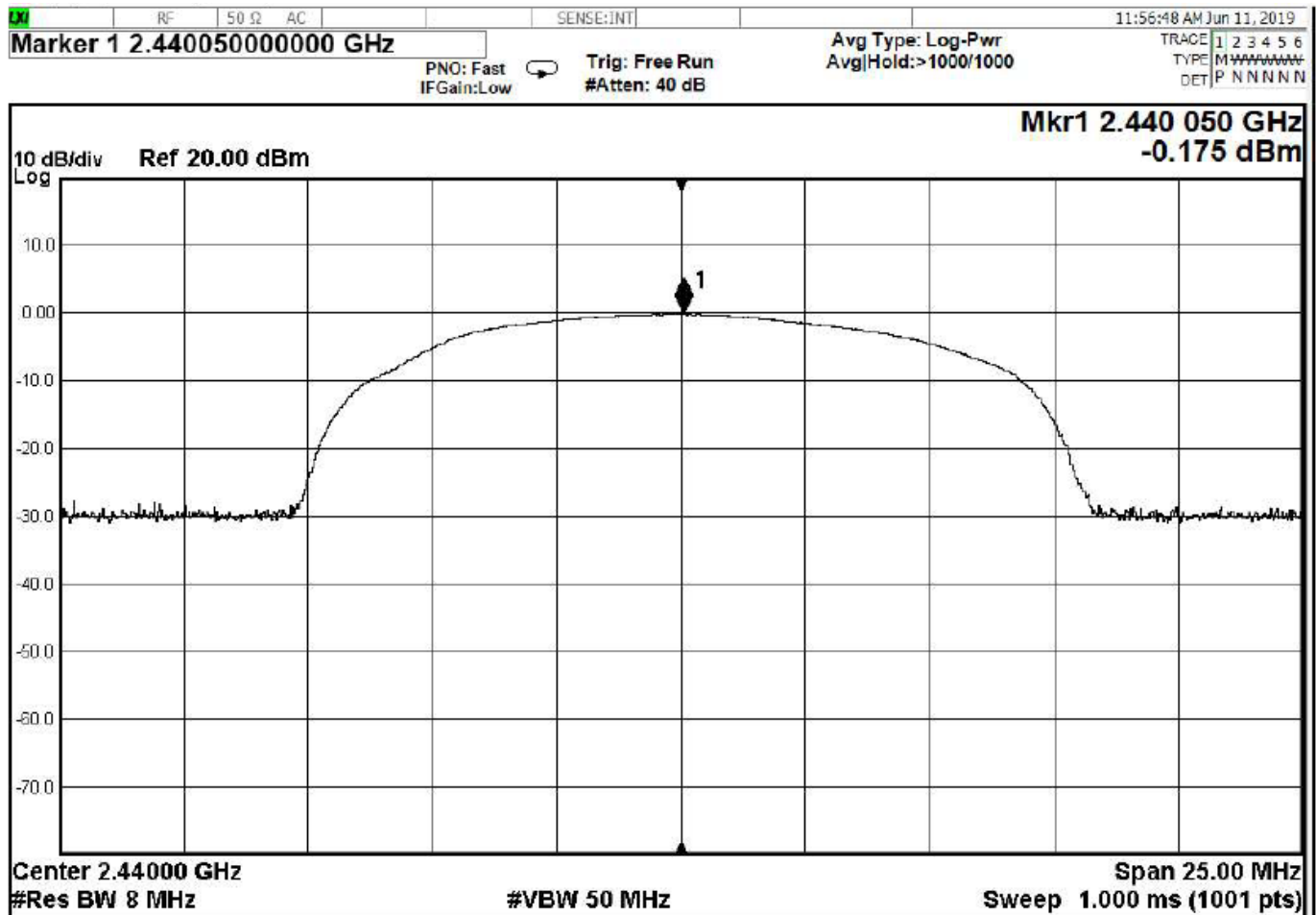


Figure 2 – Output Power, Mid Channel, GMSK

Output power = -0.175 dBm

Cable loss was less than 0.1 dB and not included

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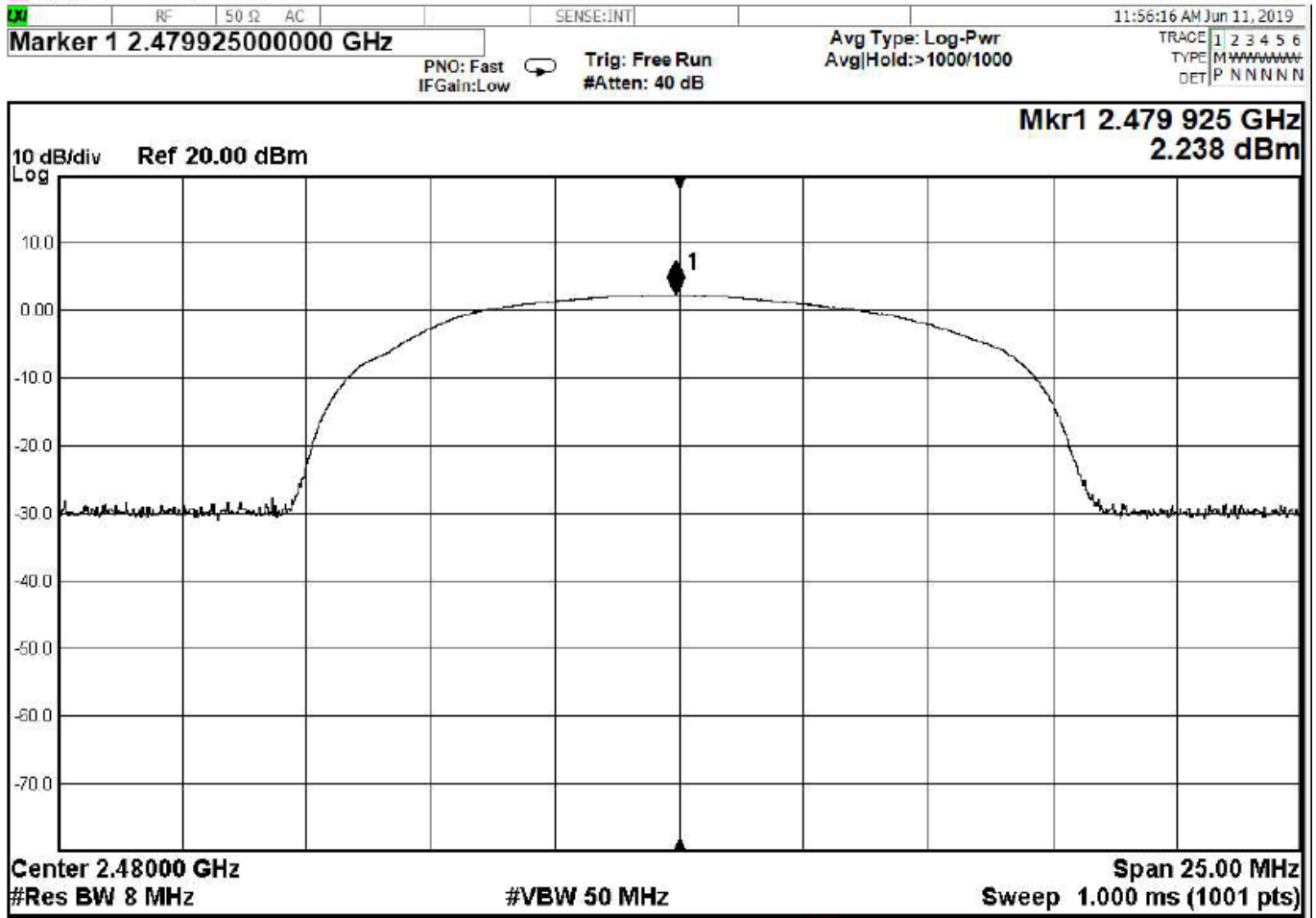


Figure 3 – Output Power, High Channel, GMSK

Output power = 2.238 dBm

Cable loss was less than 0.1 dB and not included

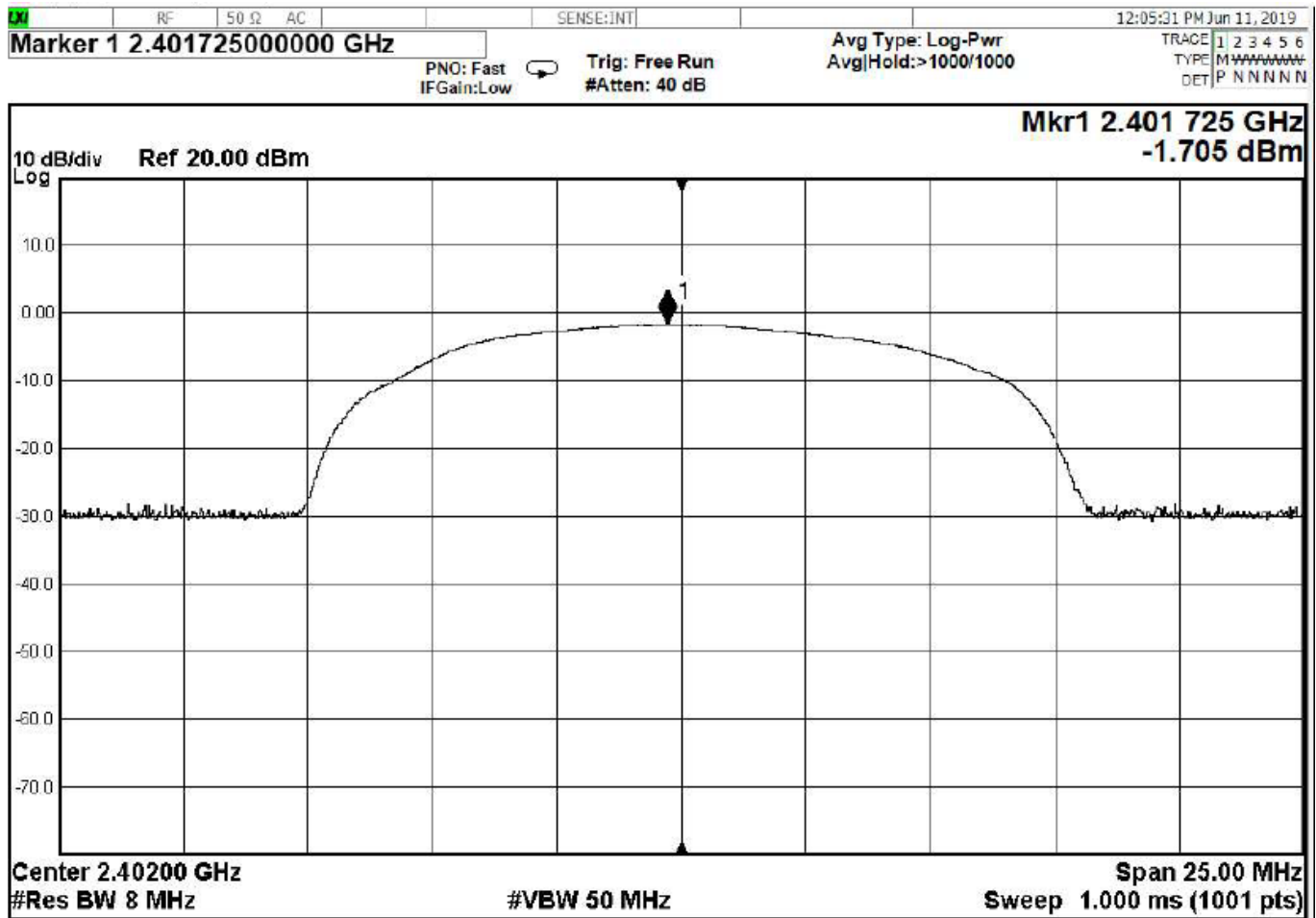


Figure 4 - Output Power, Low Channel, GFSK

Output power = -1.705 dBm

Cable loss was less than 0.1 dB and not included

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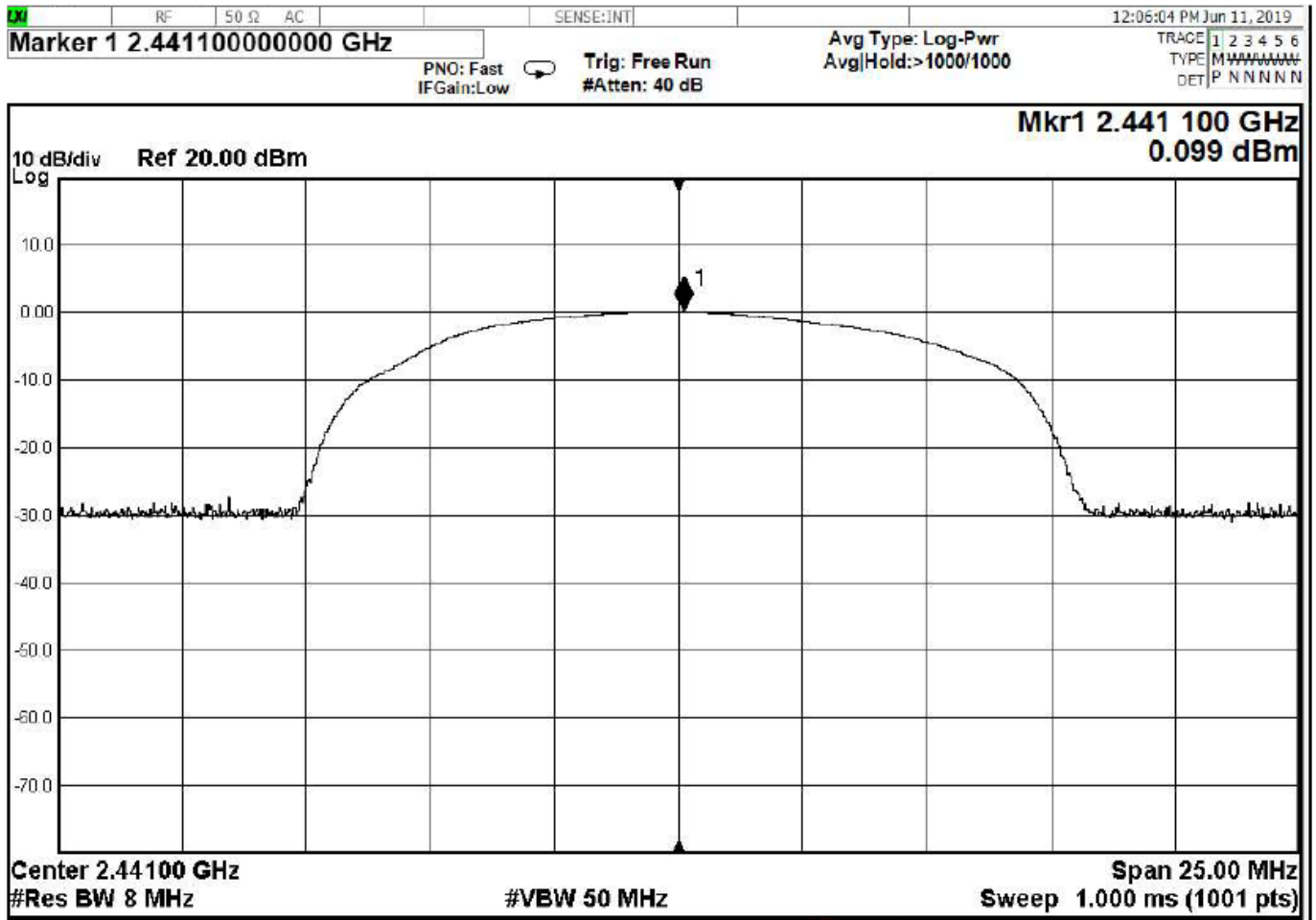


Figure 5 - Output Power, Mid Channel, GFSK

Output power = 0.099 dBm

Cable loss was less than 0.1 dB and not included

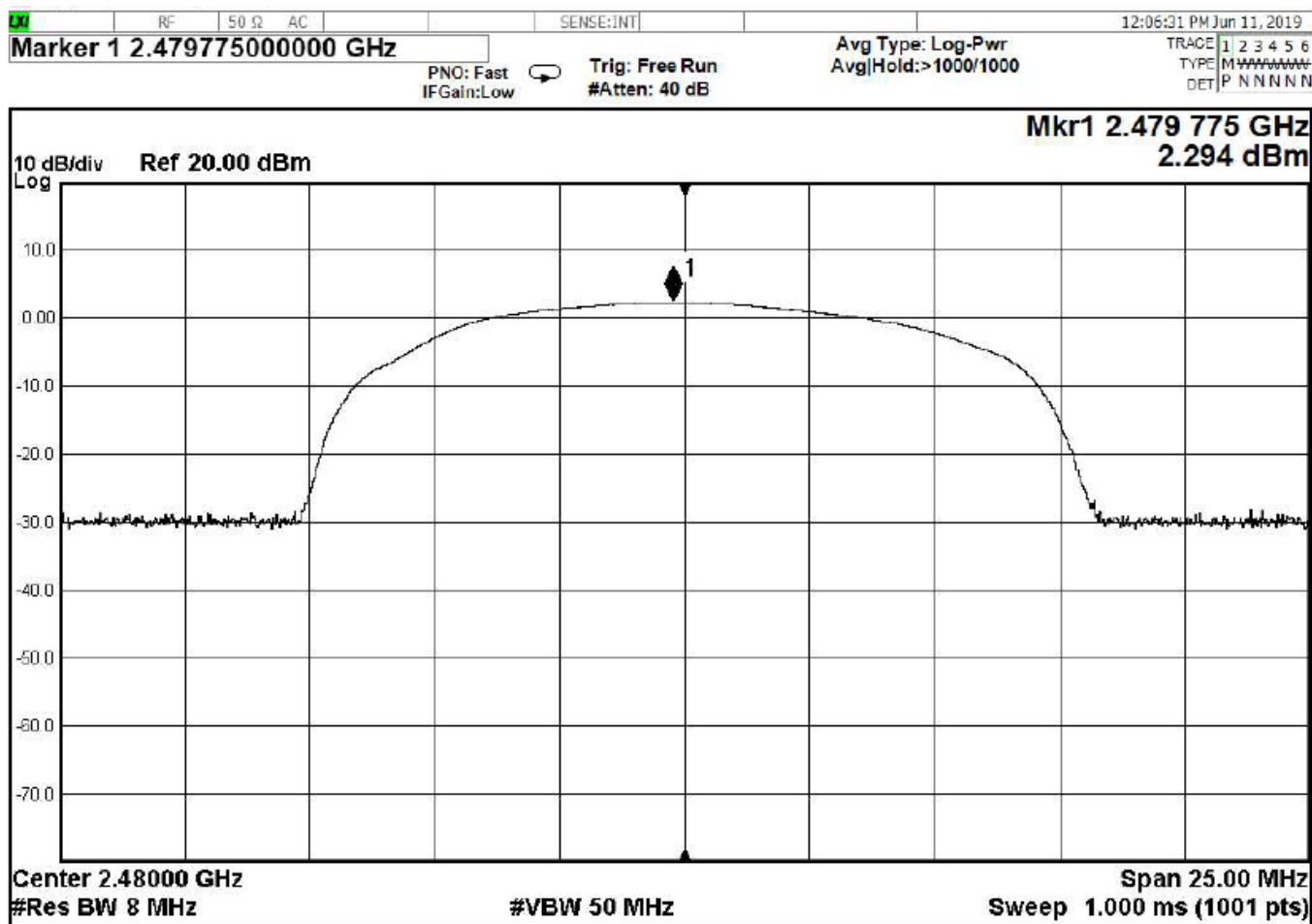


Figure 6 - Output Power, High Channel, GFSK

Output power = 2.294 dBm

Cable loss was less than 0.1 dB and not included

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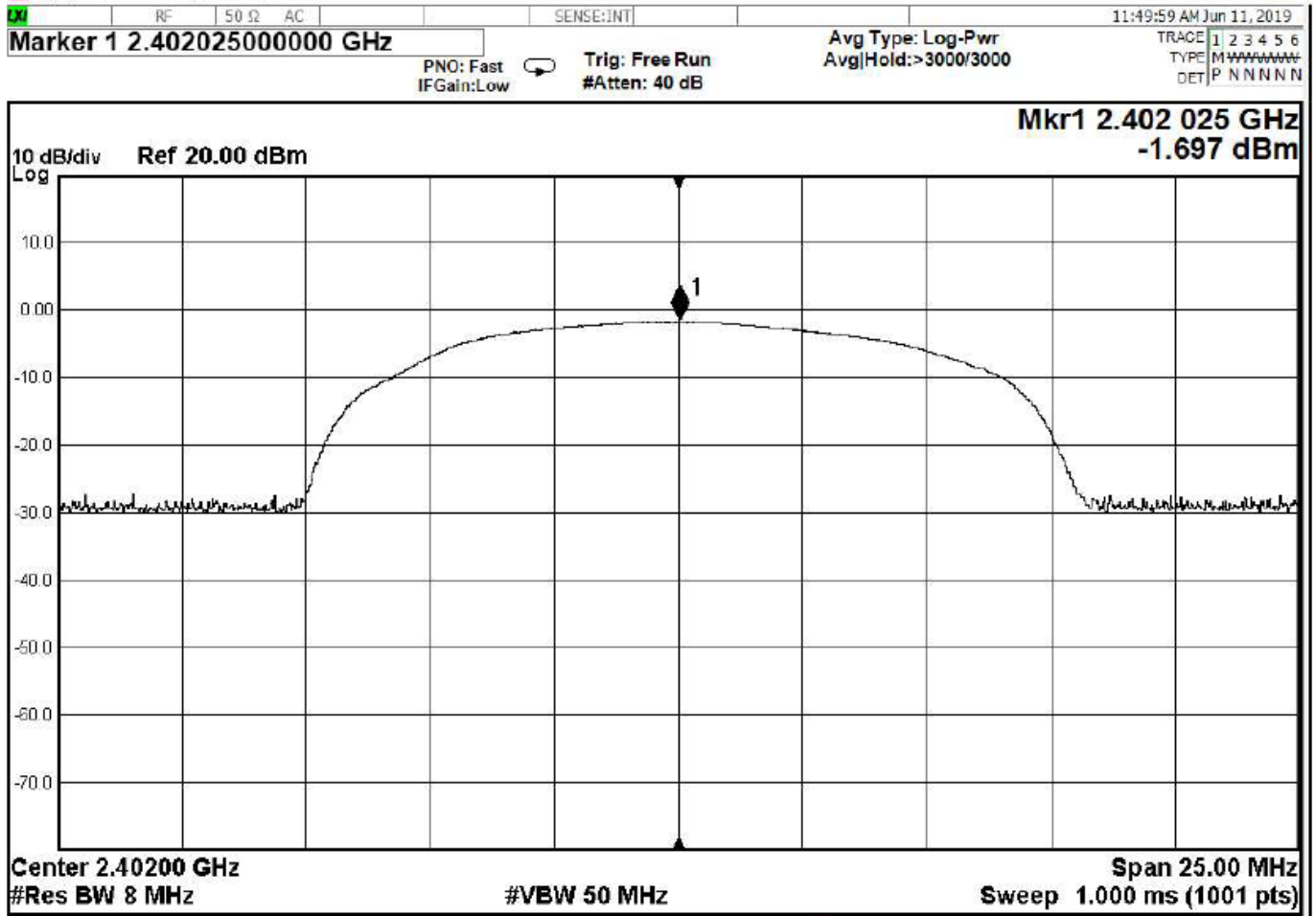


Figure 7 – Output Power, Low Channel, GFSK (BT BR)

Output power -1.697 dBm

Cable loss was less than 0.1 dB and not included

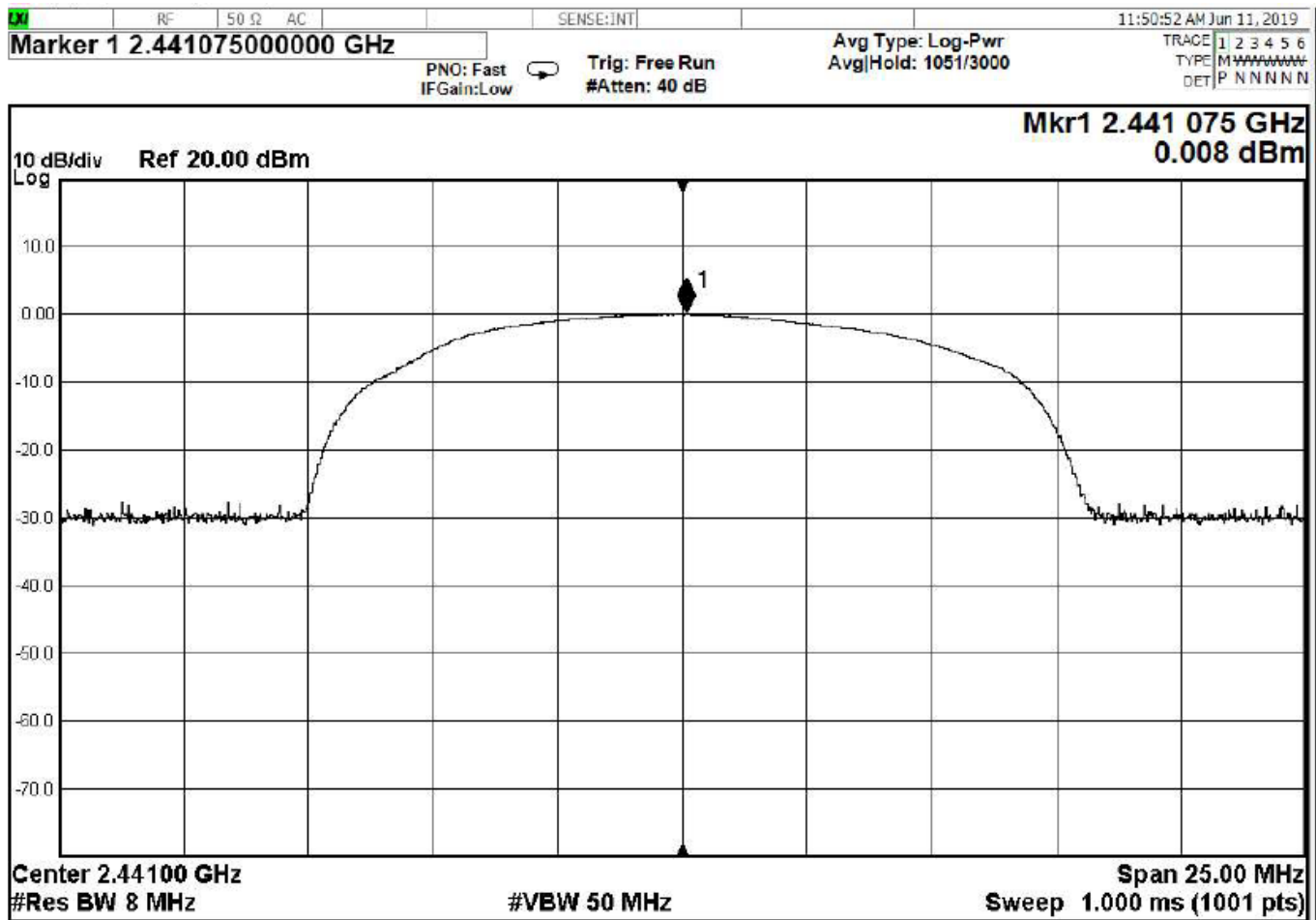


Figure 8 – Output Power, Mid Channel, GFSK (BT BR)

Output power = 0.008 dBm

Cable loss was less than 0.1 dB and not included

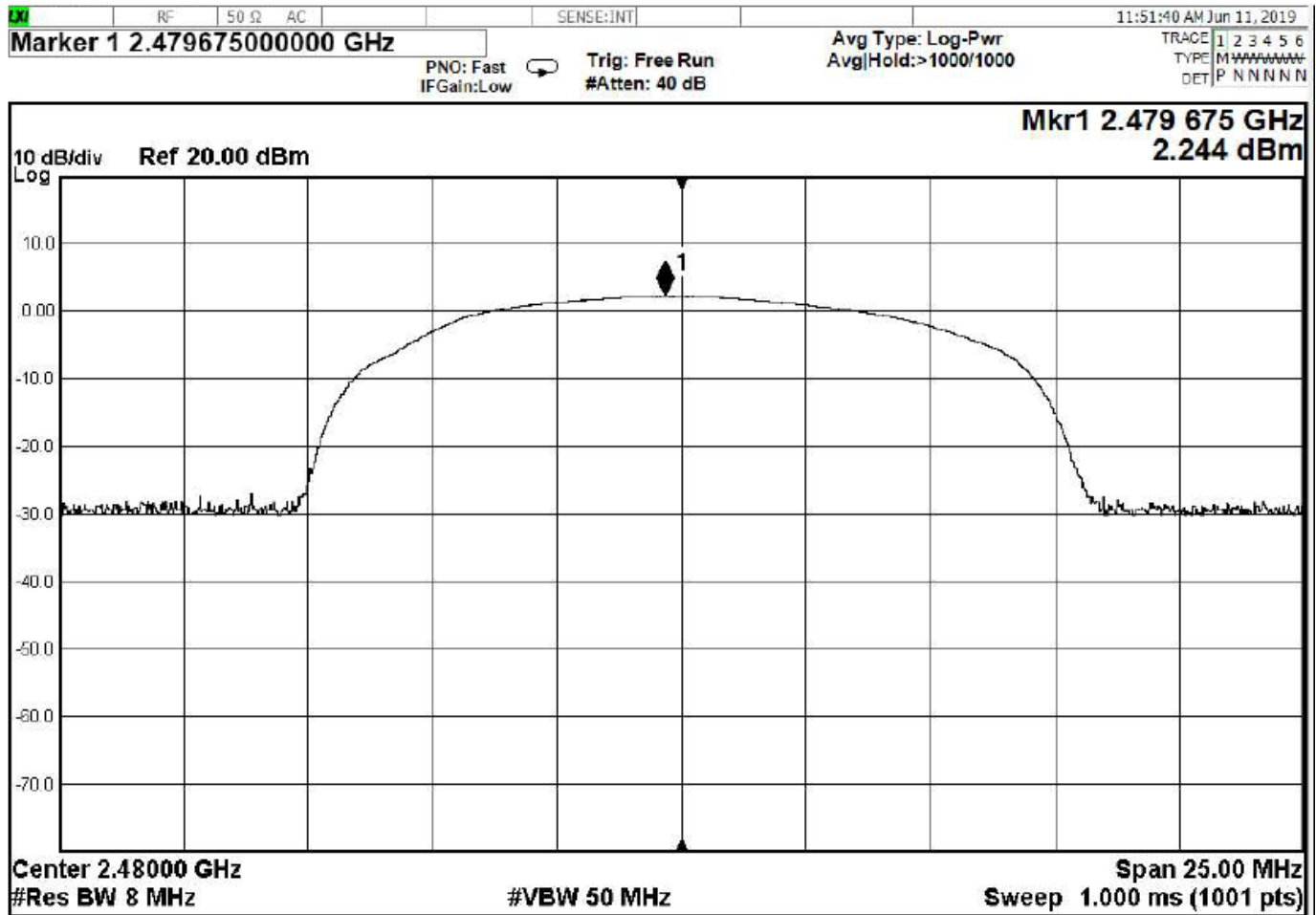


Figure 9 – Output Power, High Channel, GFSK (BT BR)

Output power = 2.244 dBm

Cable loss was less than 0.1 dB and not included



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4.3 BANDWIDTH

Test Method: ANSI C63.10-2013, Section(s) 6.9.3

Limits of bandwidth measurements:

For Informational Purposes only

Test procedures:

1. The EUT was connected to the spectrum analyzer directly with a low-loss shielded coaxial cable
2. The 99% Occupied Bandwidth was measured using the spectrum analyzer's occupied bandwidth function.

Test setup:

The field strength was measured by connecting the EUT directly to the spectrum analyzer.

Deviations from test standard:

No deviation.

Test setup:

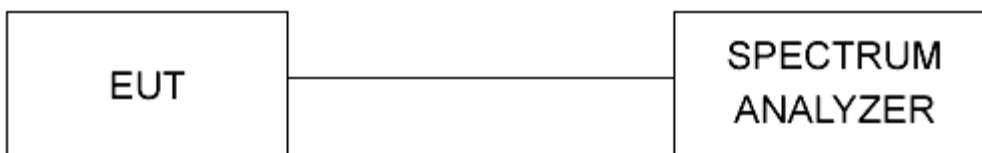


Figure 10 - Bandwidth Measurements Test Setup

EUT operating conditions:

The EUT was powered by internal battery power unless specified and set to transmit continuously on the lowest frequency channel, highest frequency channel and one in the middle of its operating range. EUT was set to transmit in GMSK and GFSK.

Test results:

99% Occupied Bandwidth

CHANNEL	Mode	CHANNEL FREQUENCY (MHz)	OBW (KHz)	RESULT
Low	GMSK	2402	1049.9	PASS
Mid	GMSK	2440	1046.4	PASS
High	GMSK	2480	1042.8	PASS
Low	GFSK	2402	950.51	PASS
Mid	GFSK	2440	947.38	PASS
High	GFSK	2480	955.40	PASS
Low	GFSK (BTBR)	2402	953.06	PASS
Mid	GFSK (BTBR)	2440	948.14	PASS
High	GFSK (BTBR)	2480	956.66	PASS

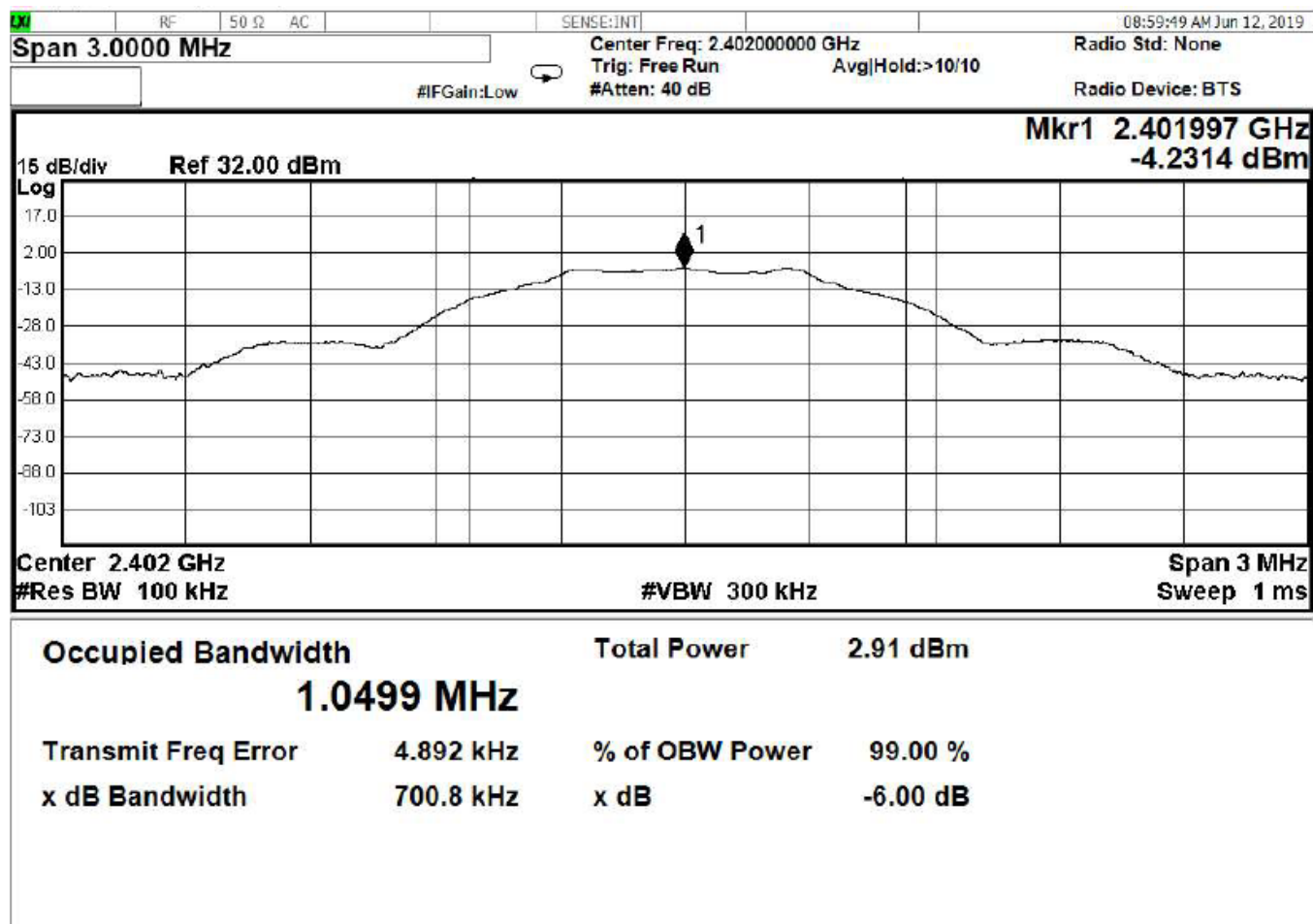


Figure 11 - Occupied Bandwidth, Low Channel, GMSK

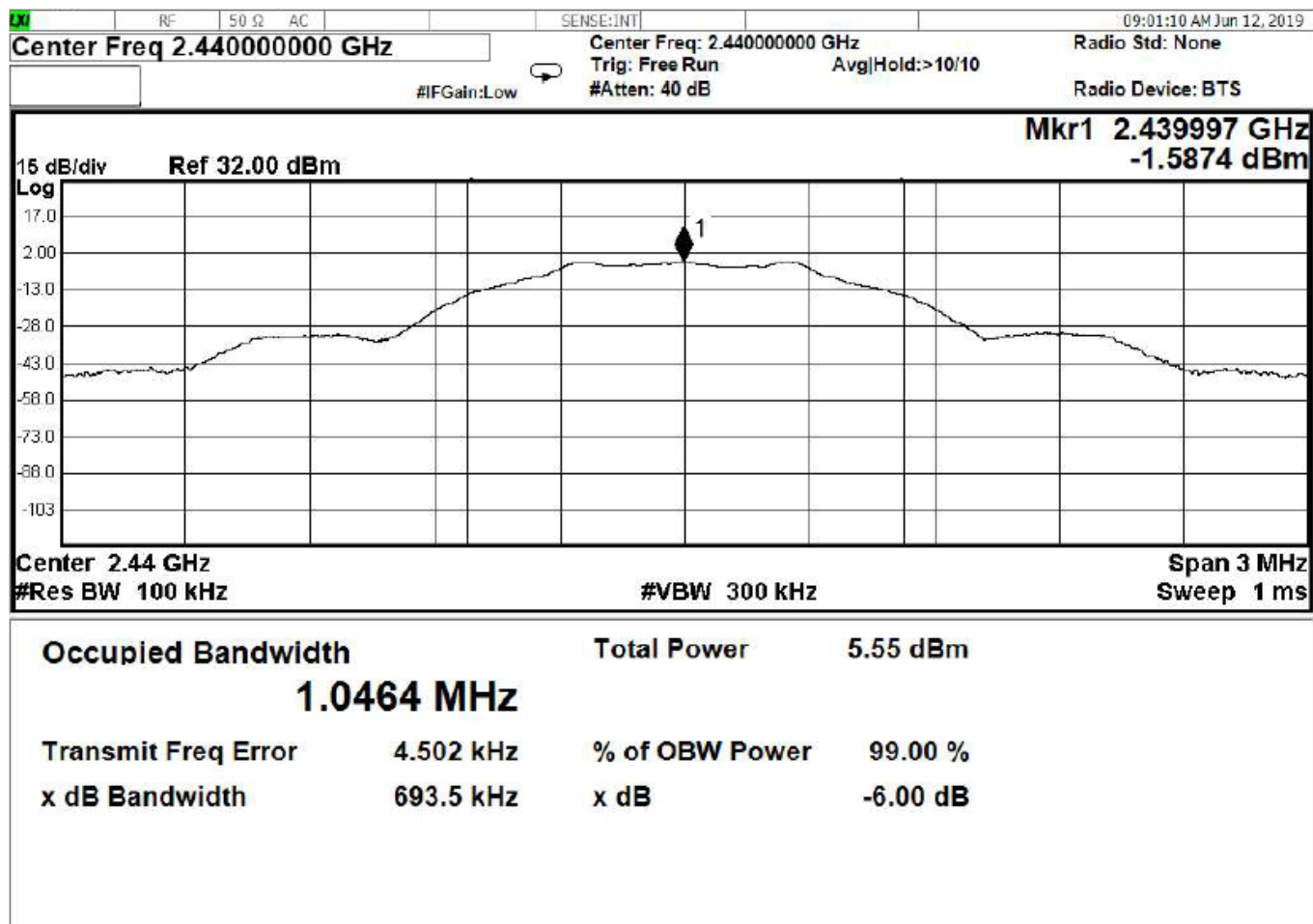


Figure 12 - Occupied Bandwidth, Mid Channel, GMSK

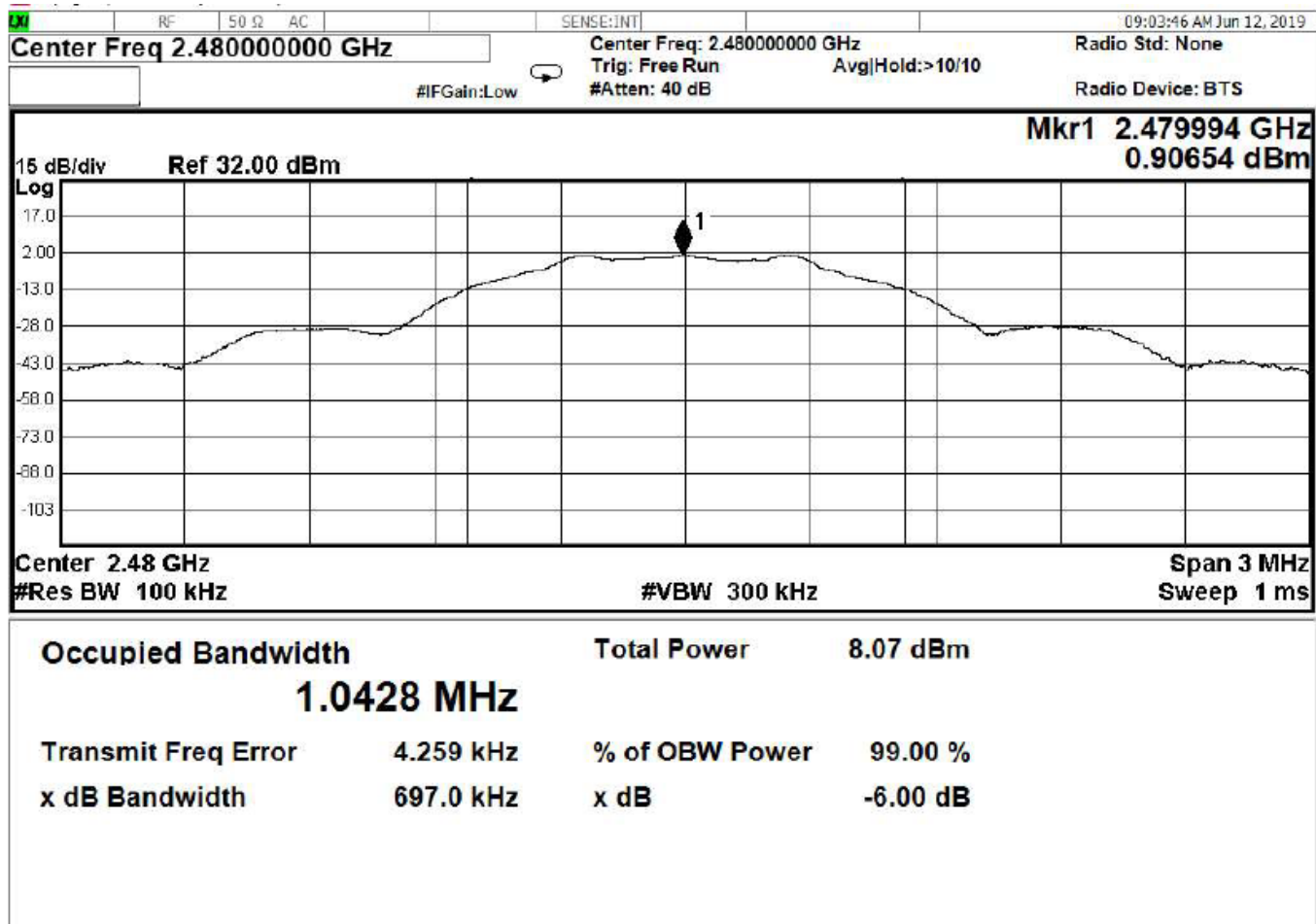


Figure 13 - Occupied Bandwidth, High Channel, GMSK

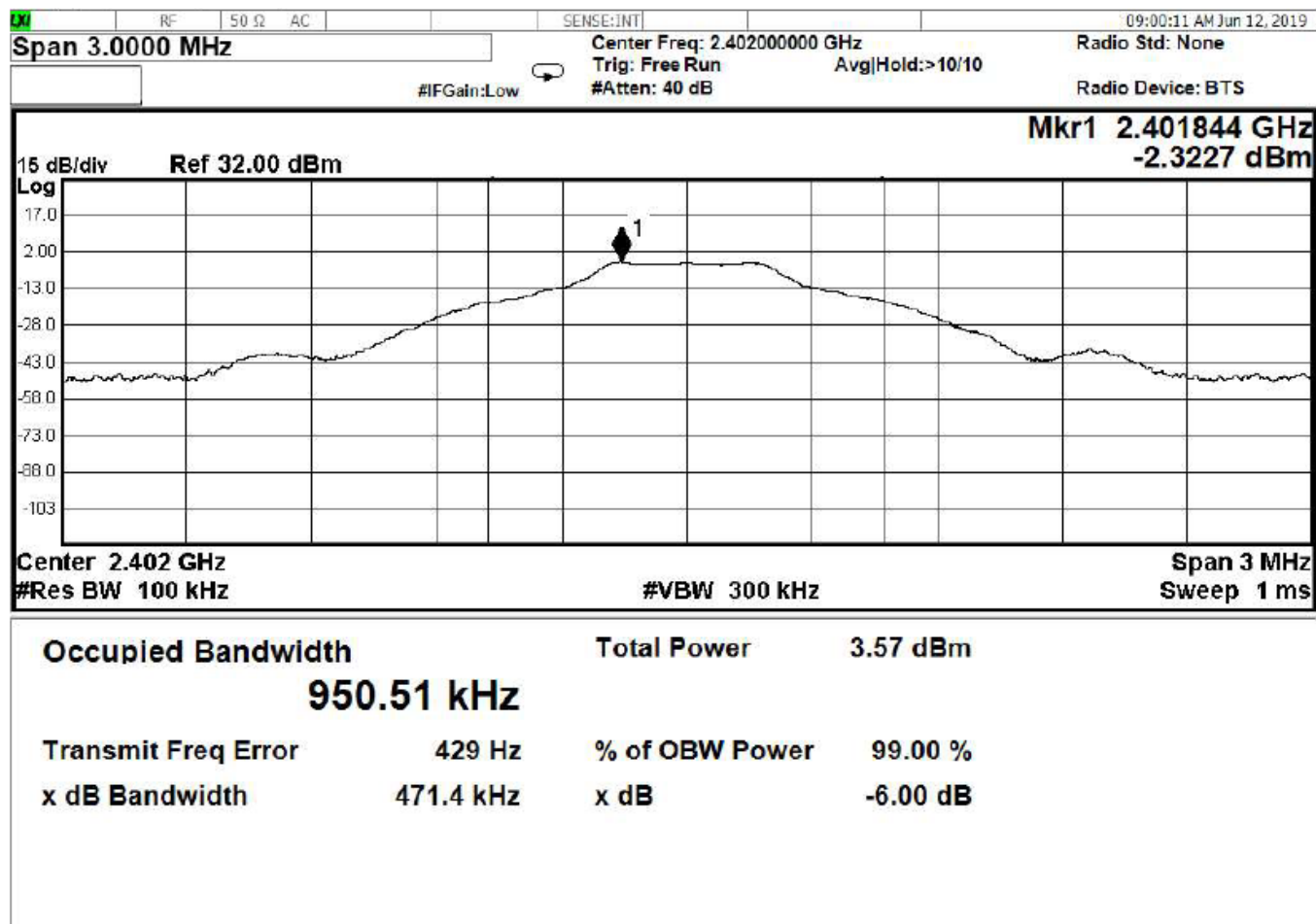


Figure 14 – Occupied Bandwidth, Low Channel, GFSK

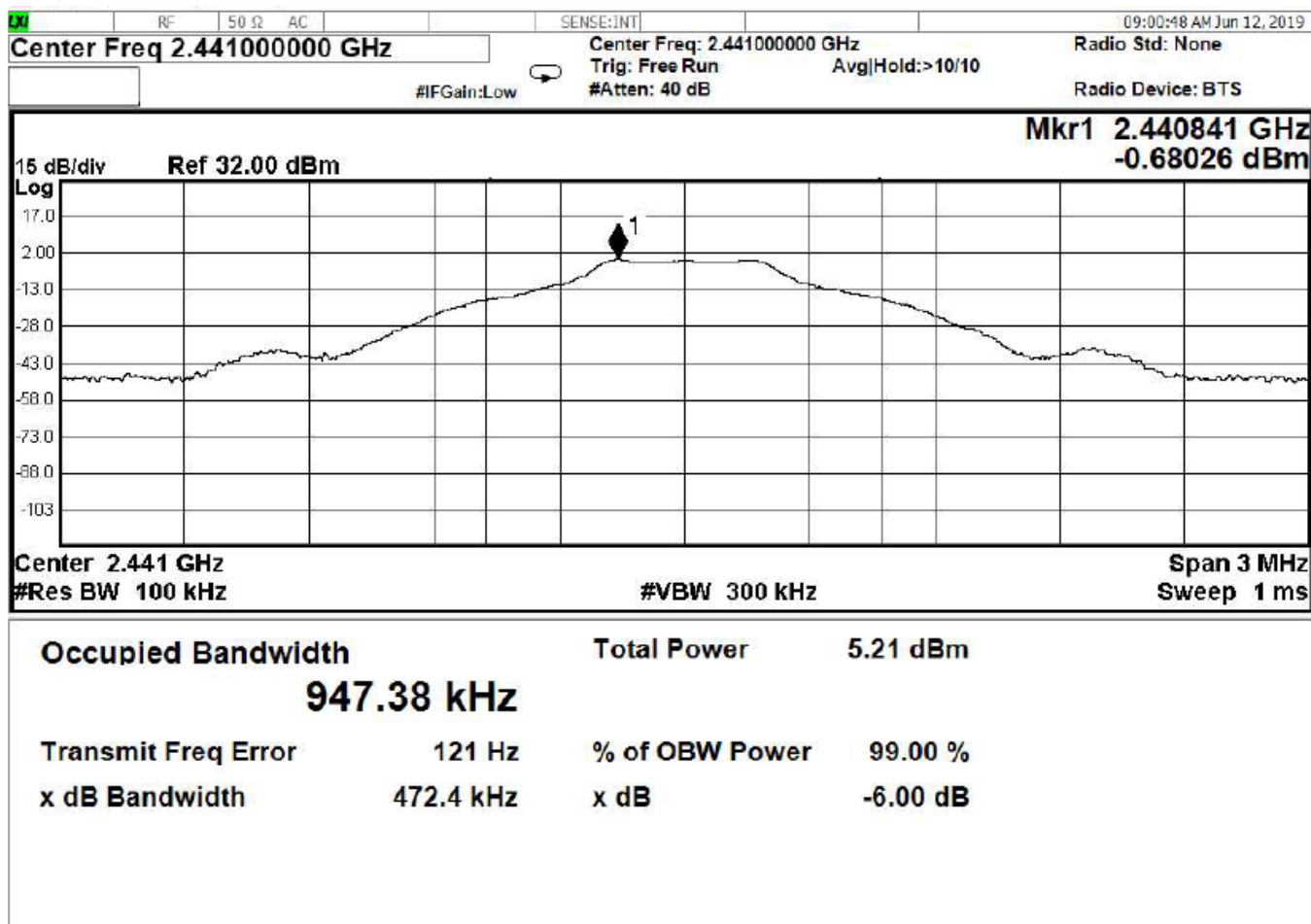


Figure 15 - Occupied Bandwidth, Mid Channel, GFSK

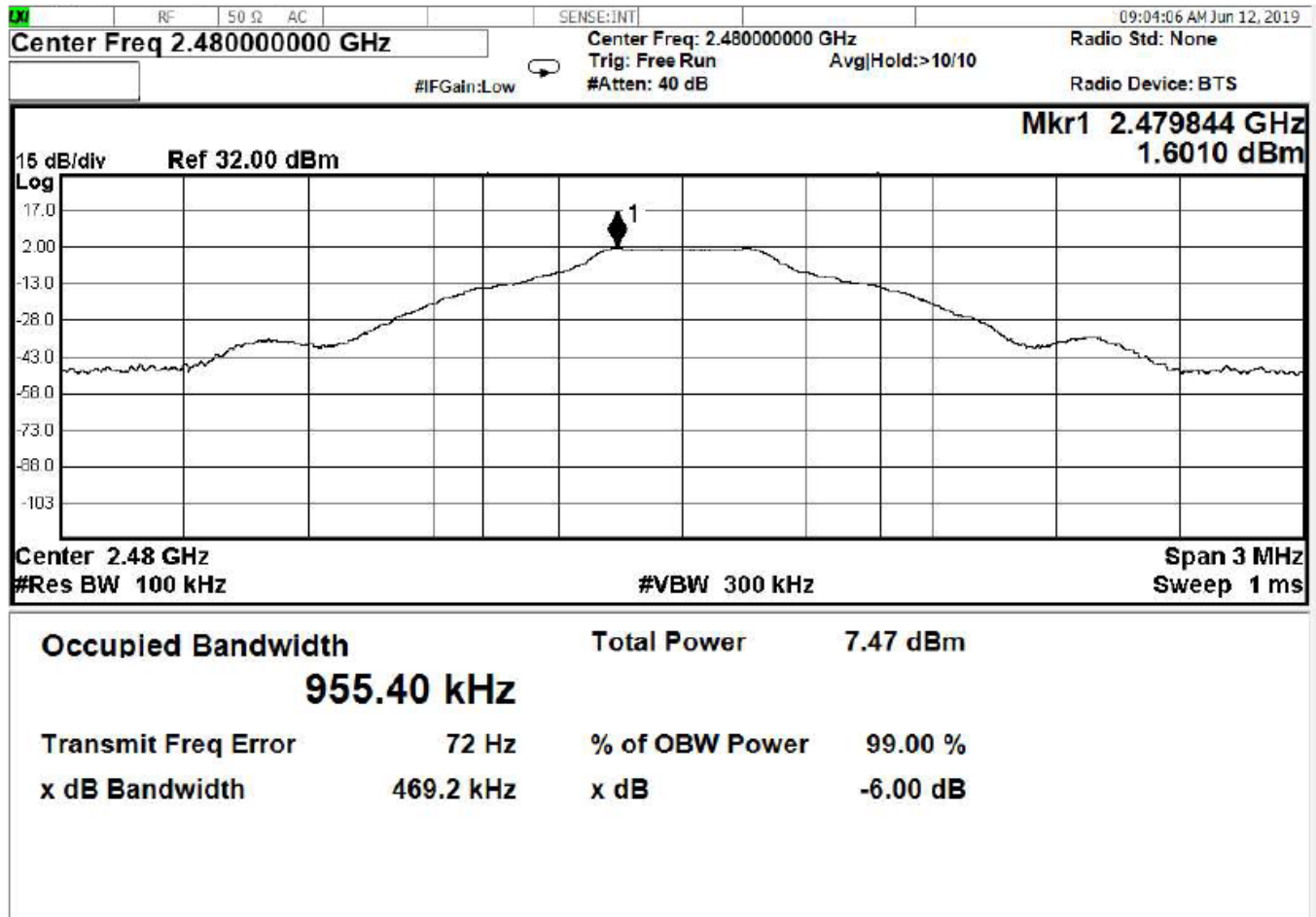


Figure 16 - Occupied Bandwidth, High Channel, GFSK

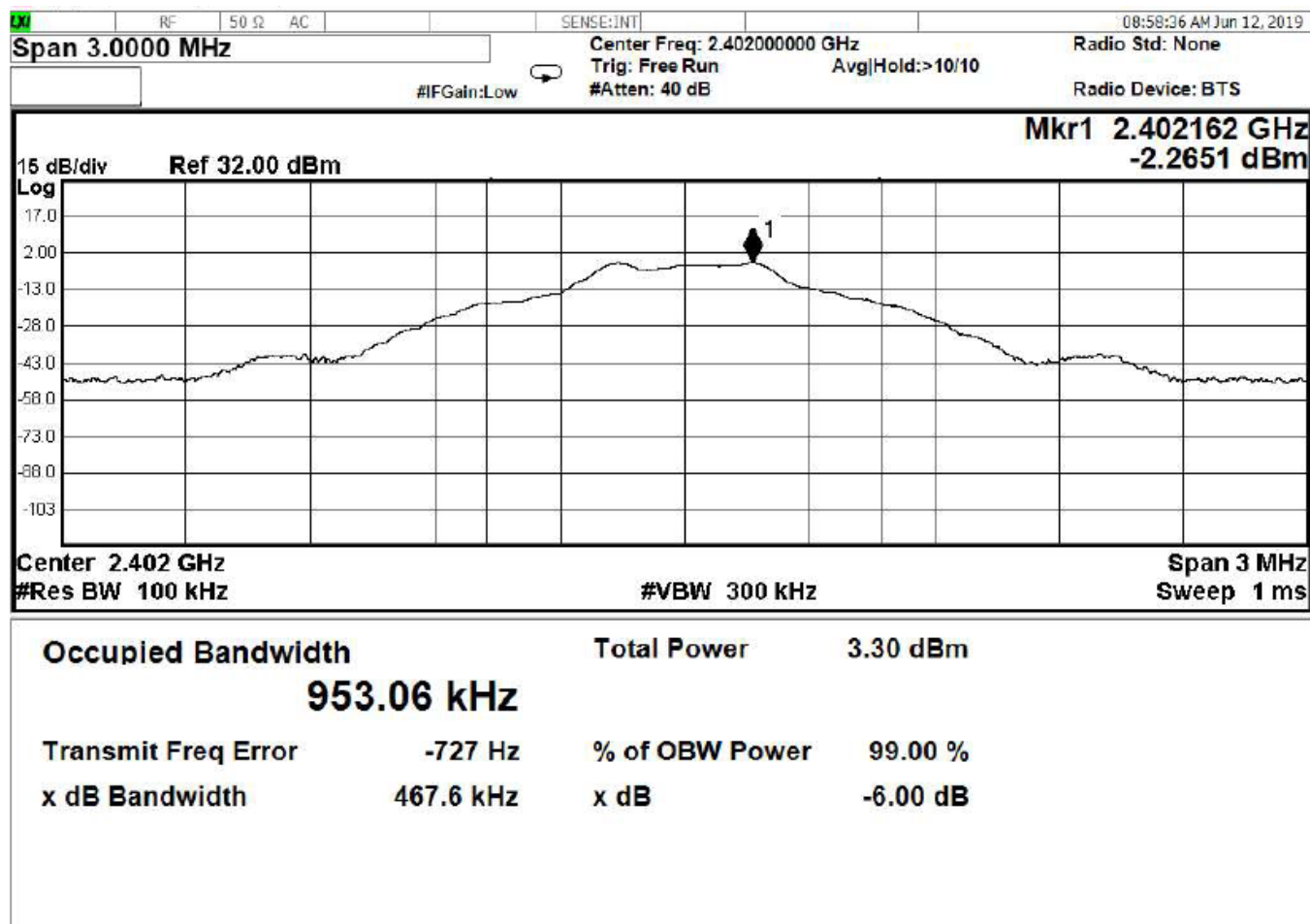


Figure 17 - Occupied Bandwidth, Low Channel, GFSK (BT BR)

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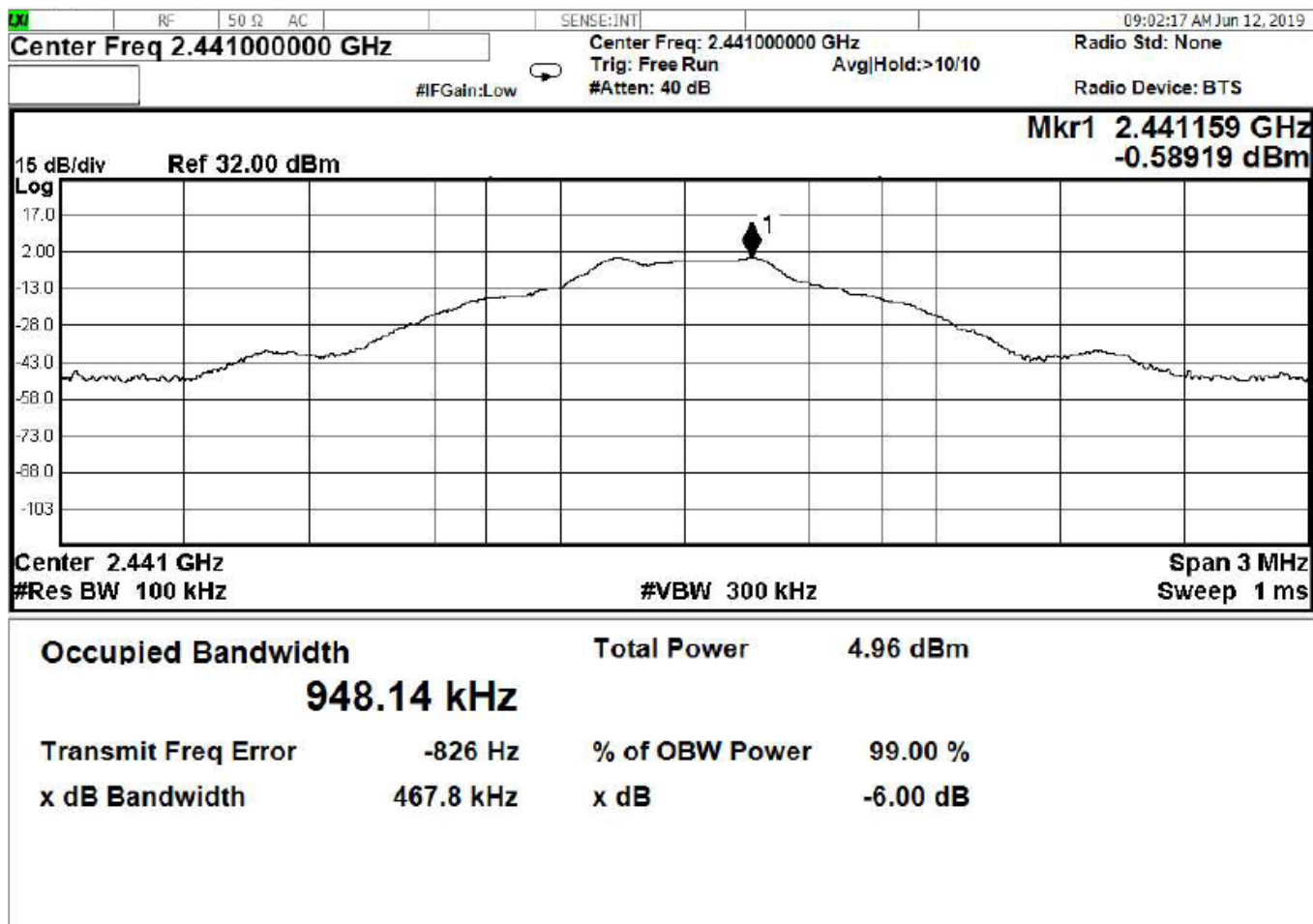


Figure 18 - Occupied Bandwidth, Mid Channel, GFSK (BT BR)

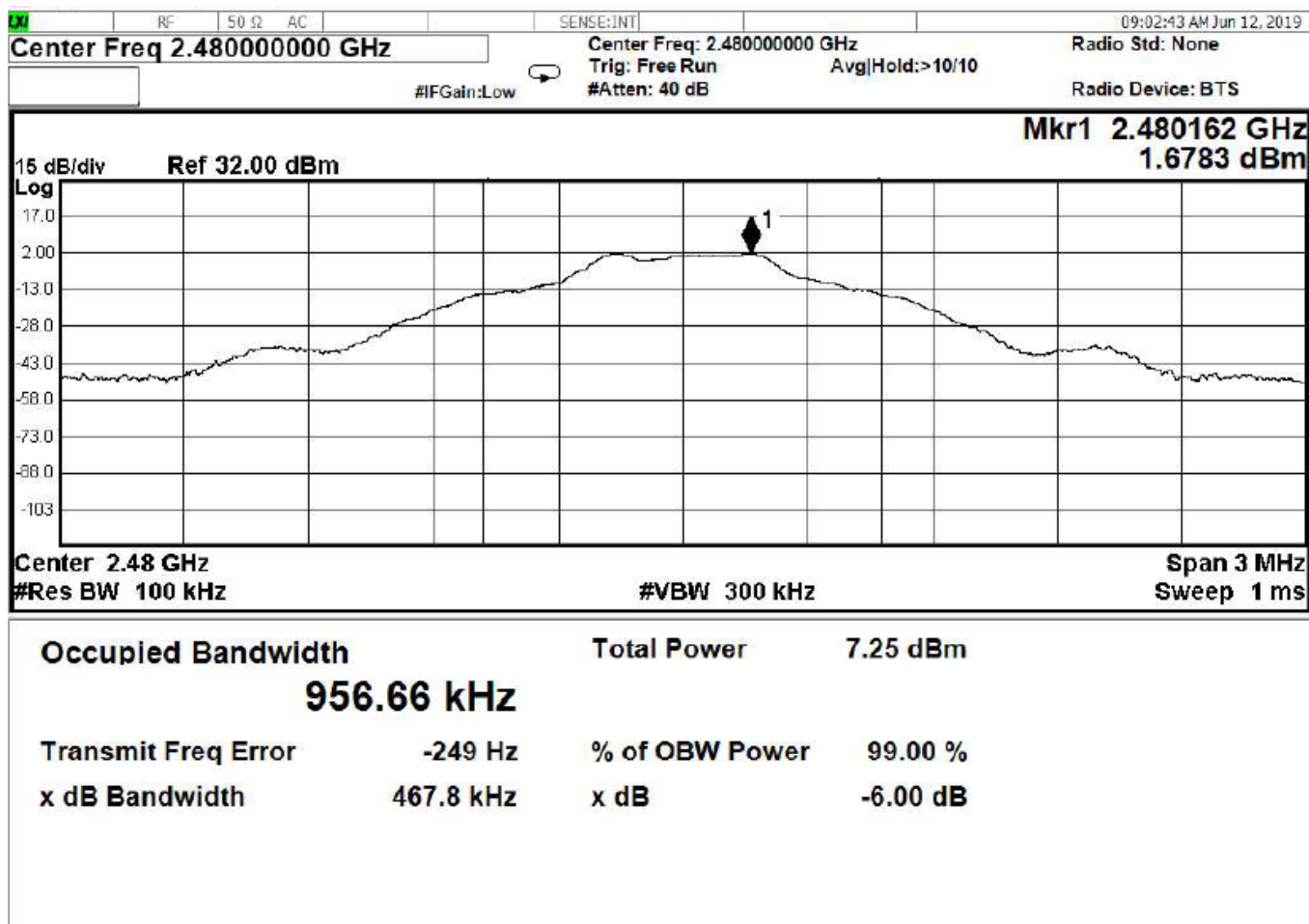


Figure 19 - Occupied Bandwidth, High Channel, GFSK (BT BR)

4.4 RADIATED EMISSIONS

Test Method: ANSI C63.10-2013, Section 6.5, 6.6

Limits for radiated emissions measurements:

Emissions radiated outside of the specified bands shall be applied to the limits in 15.209 as followed:

FREQUENCIES (MHz)	FIELD STRENGTH ($\mu\text{V/m}$)	MEASUREMENT DISTANCE (m)
0.009-0.490	2400/F(kHz)	300
0.490-1.705	24000/F(kHz)	30
1.705-30.0	30	3
30-88	100	3
88-216	150	3
216-960	200	3
Above 960	500	3

NOTE:

1. The lower limit shall apply at the transition frequencies.
2. Emission level (dBuV/m) = $20 * \log * \text{Emission level } (\mu\text{V/m})$.
3. As shown in 15.35(b), for frequencies above 1000MHz, the field strength limits are based on average detector, however, the peak field strength of any emission shall not exceed the maximum permitted average limits by more than 20dB under any condition of modulation.
4. The EUT was tested for spurious emissions while running off of battery power and external USB power. The worse-case emissions were produced while running off of USB power, so results from this mode are presented.

Test procedures:

- The EUT was placed on the top of a rotating table above the ground plane in a 10 meter semi-anechoic chamber. The table was rotated 360 degrees to determine the position of the highest radiation. The table was 0.8m high for measurements from 30MHz-1Ghz and 1.5m for measurements from 1GHz and higher.
- The EUT was set 3 meters away from the interference-receiving antenna, which was mounted on the top of a variable-height antenna tower.
- The antenna was a broadband antenna, and its height is varied from one meter to four meters above the ground to determine the maximum value of the field strength. Both horizontal and vertical polarizations of the antenna are used to make the measurement.
- For each suspected emission, the EUT was arranged to maximize its emissions and then the antenna height was varied from 1 meter to 4 meters and the rotating table was turned from 0 degrees to 360 degrees to find the maximum emission reading.
- The test-receiver system was set to use a peak detector with a specified resolution bandwidth. For spectrum analyzer measurements, the composite maximum of several analyzer sweeps was used for final measurements.
- If the emission level of the EUT in peak mode was 10dB lower than the limit specified, then testing could be stopped and the peak values of the EUT would be reported. Otherwise the emissions that did not have 10 dB margin would be re-tested one by one using peak, quasi-peak or average method as specified and then reported in a data sheet.
- The EUT was maximized in all 3 orthogonal positions. The results are presented for the axis that had the highest emissions.
- The EUT was tested on both battery and external USB. The worse-case orientation was found during the preview scan, and it was with the USB, so that was used for the remainder of testing

Test setup:

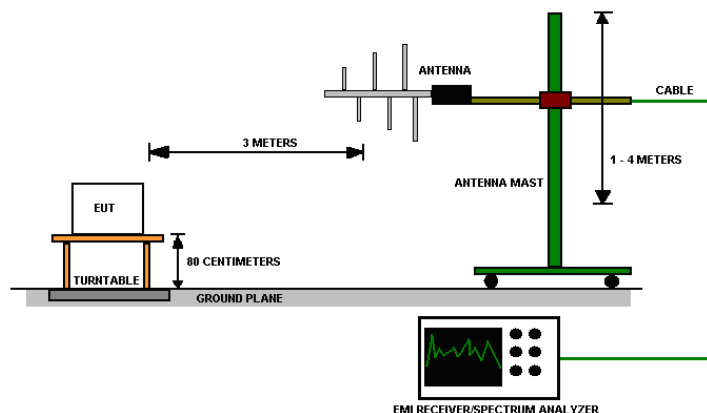


Figure 20 - Radiated Emissions Test Setup



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NOTE:

1. The resolution bandwidth and video bandwidth of test receiver/spectrum analyzer is 120kHz for Peak detection (PK) and Quasi-peak detection (QP) at frequencies below 1GHz.

2. The resolution bandwidth 1 MHz for all measurements and at frequencies above 1GHz, A peak detector was used for all measurements above 1GHz. Measurements were made with an EMI Receiver.

Deviations from test standard:

No deviation.

EUT operating conditions

The EUT was powered by internal battery power unless specified and set to transmit continuously on the lowest frequency channel, highest frequency channel and one in the middle of its operating range. EUT was set to transmit in GMSK and GFSK.

Test results:

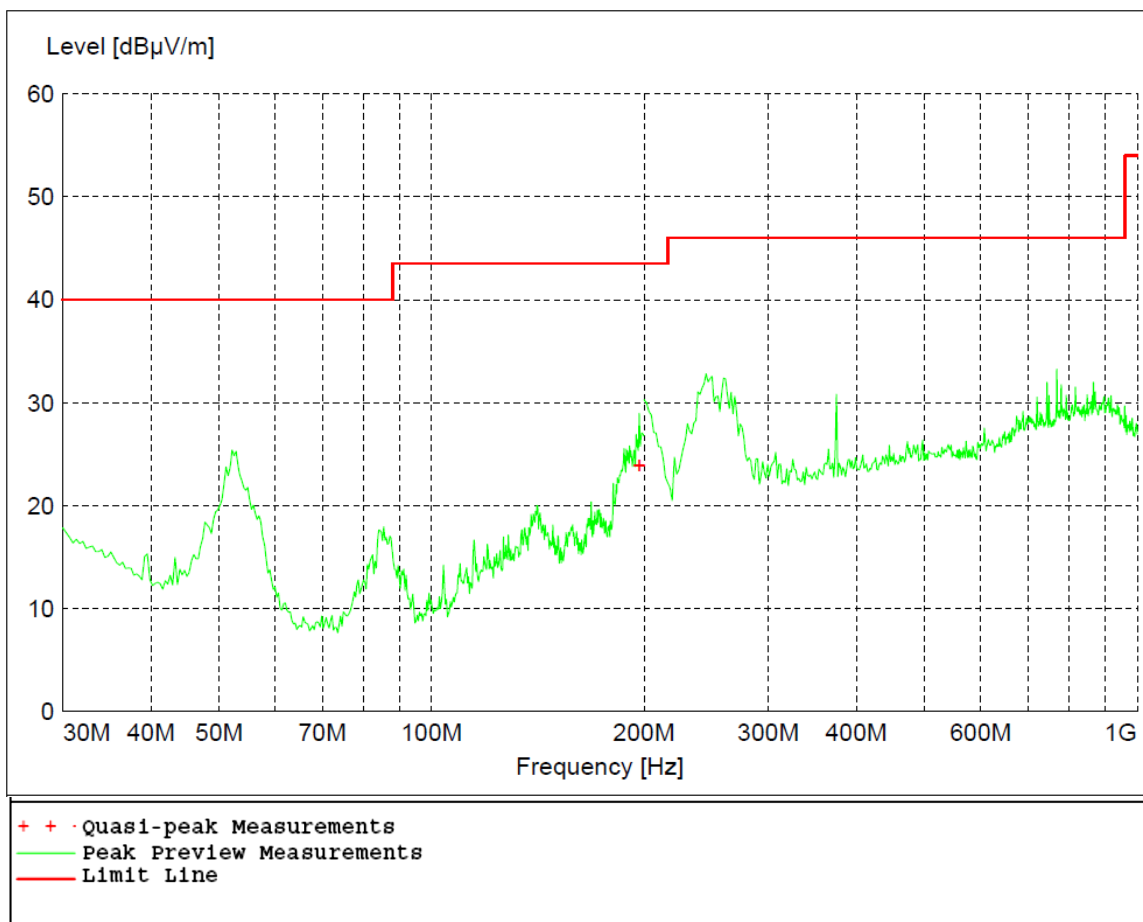


Figure 21 - Radiated Emissions Plot, Receive

REMARKS:

1. Emission level (dBuV/m) = Raw Value (dBuV) + Correction Factor (dB)
2. Correction Factor (dB/m) = Antenna Factor (dB/m) + Cable Factor (dB)
3. The other emission levels were very low against the limit.
4. Margin value = Emission level – Limit value

Table 1 - Radiated Emissions Quasi-peak Measurements, Receive

Frequency	Level	Limit	Margin	Height	Angle	Pol
MHz	dBμV/m	dBμV/m	dB	cm.	deg.	
197.040000	23.97	43.50	19.50	143	358	HORI

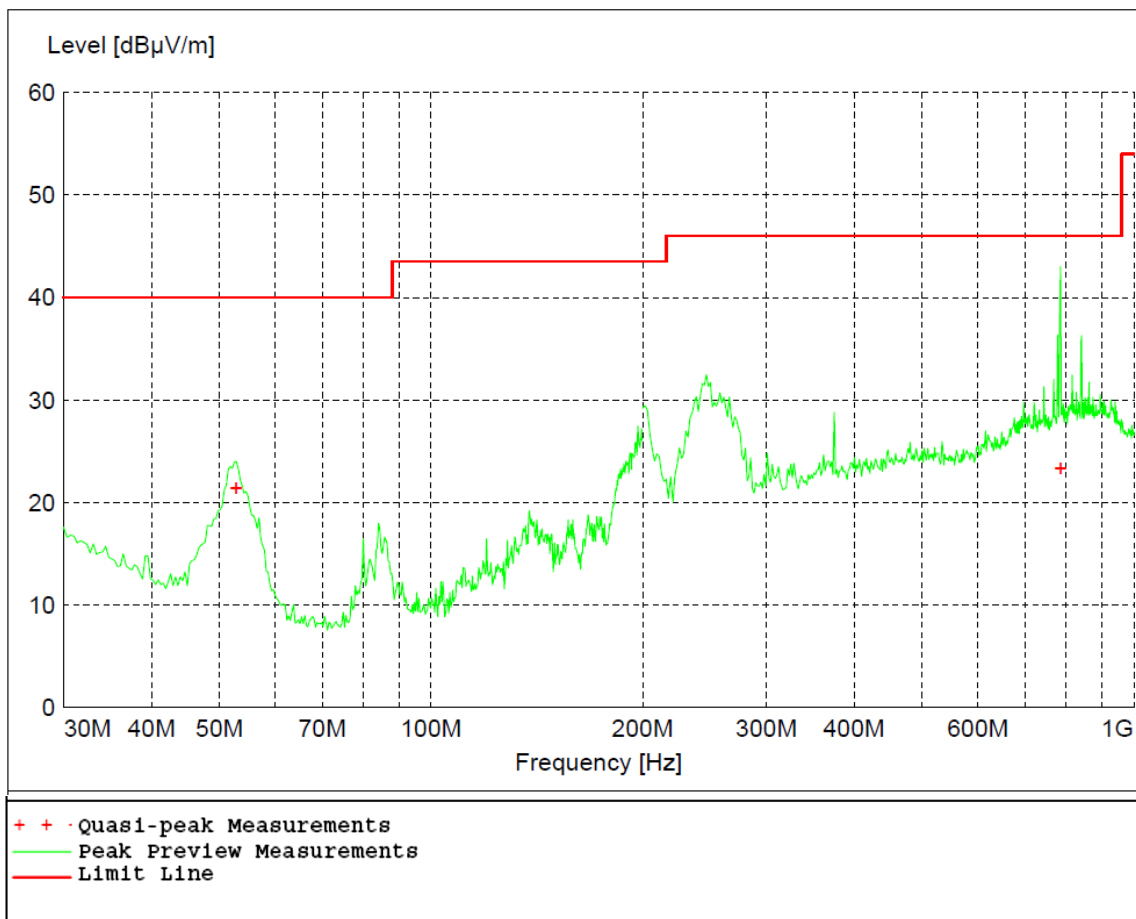


Figure 22 - Radiated Emissions Plot, GMSK

REMARKS:

1. Emission level (dBuV/m) = Raw Value (dBuV) + Correction Factor (dB)
2. Correction Factor (dB/m) = Antenna Factor (dB/m) + Cable Factor (dB)
3. The other emission levels were very low against the limit.
4. Margin value = Emission level – Limit value

Table 2 - Radiated Emissions Quasi-peak Measurements, GMSK

Frequency	Level	Limit	Margin	Height	Angle	Pol
MHz	dBμV/m	dBμV/m	dB	cm.	deg.	
52.860000	21.48	40.00	18.50	103	300	VERT
787.740000	23.43	46.00	22.60	206	234	VERT

The EUT was maximized in all 3 orthogonal axis. The worst-case is shown in the table above.

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Table 3 - Radiated Emissions Peak Measurements, GMSK

Frequency	Level	Limit	Margin	Height	Angle	Pol
MHz	dB μ V/m	dB μ V/m	dB	cm.	deg.	
2402.000000	92.69	114.00	21.31	115	157	HORI
2440.000000	93.48	114.00	20.52	163	38	HORI
2480.000000	94.85	114.00	19.15	162	10	HORI

No signals were detected above system sensitivity

Table 4 - Radiated Emissions Average Measurements, GMSK

Frequency	Level	Limit	Margin	Height	Angle	Pol
MHz	dB μ V/m	dB μ V/m	dB	cm.	deg.	
2402.000000	86.62	94.00	7.38	115	157	HORI
2440.000000	87.60	94.00	6.40	163	38	HORI
2480.000000	88.91	94.00	5.09	162	10	HORI

No signals were detected above system sensitivity

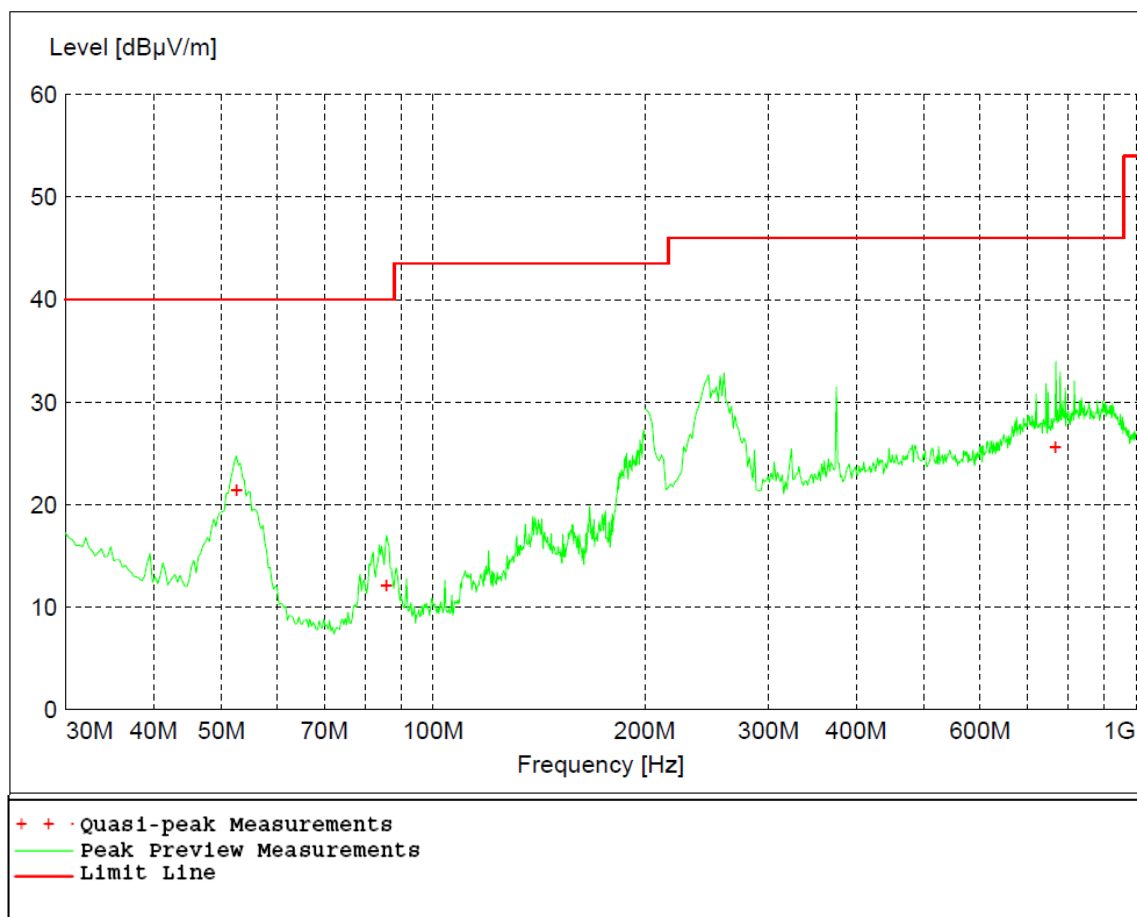


Figure 23 - Radiated Emissions Plot, GFSK

REMARKS:

1. Emission level (dBμV/m) = Raw Value (dBμV) + Correction Factor (dB)
2. Correction Factor (dB/m) = Antenna Factor (dB/m) + Cable Factor (dB)
3. The other emission levels were very low against the limit.
4. Margin value = Emission level – Limit value

Table 5 - Radiated Emissions Quasi-peak Measurements, GFSK

Frequency	Level	Limit	Margin	Height	Angle	Pol
MHz	dBμV/m	dBμV/m	dB	cm.	deg.	
52.560000	21.42	40.00	18.60	99	280	VERT
85.860000	12.18	40.00	27.80	136	225	VERT
768.000000	25.68	46.00	20.30	133	322	HORI

The EUT was maximized in all 3 orthogonal axis. The worst-case is shown in the table above.



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Table 6 - Radiated Emissions Peak Measurements, GFSK

Frequency	Level	Limit	Margin	Height	Angle	Pol
MHz	dB μ V/m	dB μ V/m	dB	cm.	deg.	
2402.000000	93.45	114.00	20.55	200	46	HORI
2441.000000	94.25	114.00	19.75	210	38	HORI
2480.000000	94.09	114.00	19.91	194	304	VERT

No signals were detected above system sensitivity

Table 7 - Radiated Emissions Average Measurements, GFSK

Frequency	Level	Limit	Margin	Height	Angle	Pol
MHz	dB μ V/m	dB μ V/m	dB	cm.	deg.	
2402.000000	82.17	94.00	11.83	200	46	HORI
2441.000000	82.89	94.00	11.11	210	38	HORI
2480.000000	80.51	94.00	13.49	194	304	VERT

No signals were detected above system sensitivity

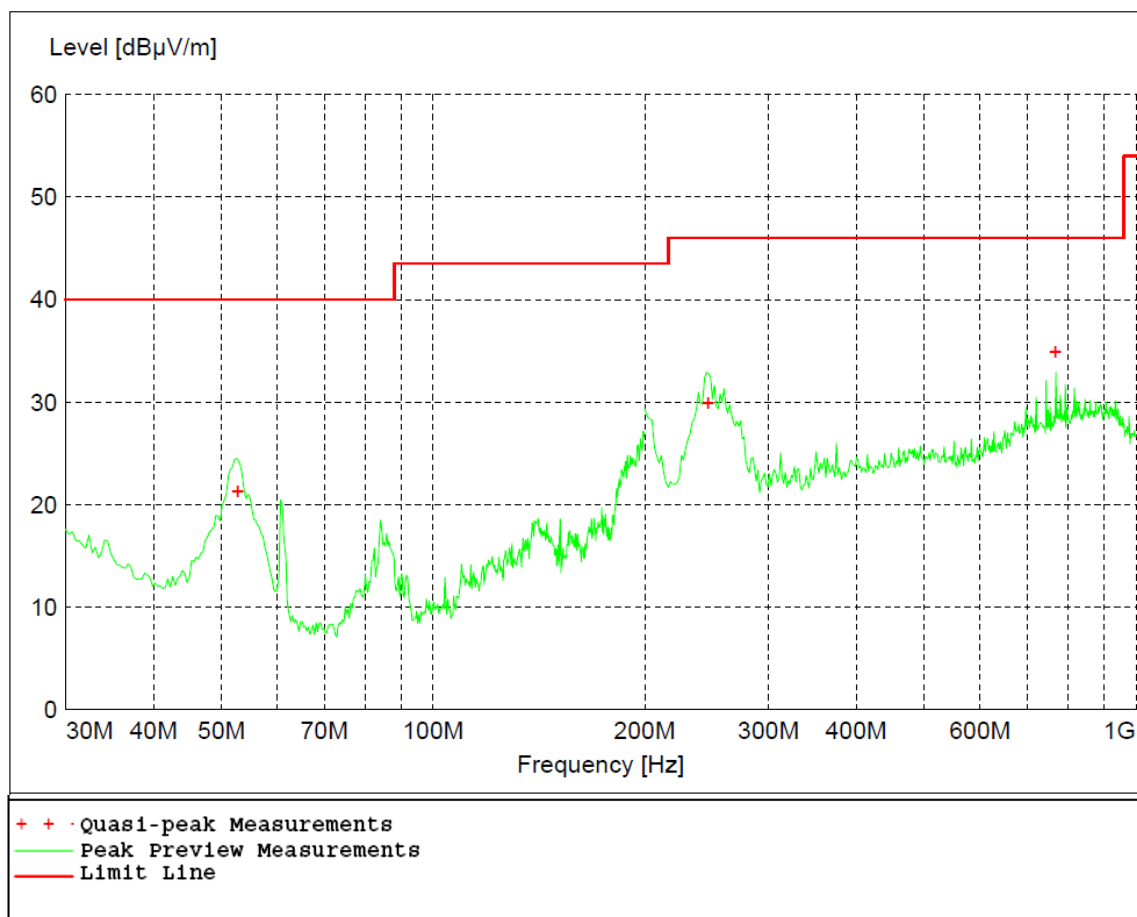


Figure 24 - Radiated Emissions Plot, GFSK (BT BR)

REMARKS:

1. Emission level (dBμV/m) = Raw Value (dBμV) + Correction Factor (dB)
2. Correction Factor (dB/m) = Antenna Factor (dB/m) + Cable Factor (dB)
3. The other emission levels were very low against the limit.
4. Margin value = Emission level – Limit value

Table 8 - Radiated Emissions Quasi-peak Measurements, GFSK (BT BR)

Frequency	Level	Limit	Margin	Height	Angle	Pol
MHz	dBμV/m	dBμV/m	dB	cm.	deg.	
52.740000	21.31	40.00	18.70	99	360	VERT
246.300000	30.00	46.00	16.00	103	219	HORI
768.000000	34.94	46.00	11.10	134	324	HORI

The EUT was maximized in all 3 orthogonal axis. The worst-case is shown in the table above.

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Table 9 - Radiated Emissions Peak Measurements, GFSK (BT BR)

Frequency	Level	Limit	Margin	Height	Angle	Pol
MHz	dB μ V/m	dB μ V/m	dB	cm.	deg.	
2402.000000	91.06	114.00	22.94	115	164	HORI
2441.000000	94.12	114.00	19.88	210	37	HORI
2480.000000	94.34	114.00	19.66	170	314	VERT

No signals were detected above system sensitivity

Table 10 - Radiated Emissions Average Measurements, GFSK (BT BR)

Frequency	Level	Limit	Margin	Height	Angle	Pol
MHz	dB μ V/m	dB μ V/m	dB	cm.	deg.	
2402.000000	76.75	94.00	17.25	115	164	HORI
2441.000000	82.72	94.00	11.28	210	37	HORI
2480.000000	80.20	94.00	13.80	170	314	VERT

No signals were detected above system sensitivity

The EUT was maximized in all 3 orthogonal axis. The worst-case is shown in the table above.



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4.5 BAND EDGES

Test Method: ANSI C63.10-2013, Section(s) 6.10.5

Limits of bandedge measurements:

For emissions outside of the allowed band of operation, the field strength levels need to be under that of the limits in 15.209.

Test procedures:

Measurements were performed by connecting the output of the transmitter directly into a spectrum analyzer using an impedance matched cable and connector soldered to the EUT in place of the antenna. The resolution bandwidth was set to 100kHz and the EMI receiver was used to scan from the bandedge to the fundamental frequency with a peak detector. The highest emissions level beyond the bandedge was measured and recorded. All band edge measurements were evaluated to the general limits in Part 15.209.

To calculate the level at the bandedge frequencies, the difference between the peak and the band edge level was subtracted from the peak radiated value at the fundamental. This value was compared to the 15.209 radiated limits for compliance.

Deviations from test standard:

No deviation.

Test setup:

The field strength was measured by connecting the EUT directly to the spectrum analyzer.

EUT operating conditions:

The EUT was powered by internal battery power unless specified and set to transmit continuously on the lowest frequency channel, highest frequency channel and one in the middle of its operating range. EUT was set to transmit in GMSK and GFSK.



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Test results:

CHANNEL	Mode	Band edge /Measurement Frequency (MHz)	Relative Highest out of band level dBm	Relative Fundamental dBm	Delta (dB)	Min Delta (dB)	Result
Low, Continuous,	GMSK	2400	-50.588	1.755	52.343	38.69	PASS
Low, Continuous,	GFSK	2400	-49.036	1.747	50.783	39.45	PASS
Low, Continuous,	GFSK (BTBR)	2400	-50.717	1.081	51.798	37.06	PASS
High, Continuous,	GMSK	2483.5	-47.073	-2.229	44.883	40.85	PASS
High, Continuous,	GFSK	2483.5	-48.133	-2.278	45.856	40.09	PASS
High, Continuous,	GFSK (BTBR)	2483.5	-47.452	-4.167	43.285	40.34	PASS

*Minimum delta = [highest fundamental field strength from Section 4.2] – [Part 15.209 radiated emissions limit.]

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From Section 4.2:

Fundamental field strength at Low Channel GMSK = 92.69 dB μ V/m
 Fundamental field strength at High Channel GMSK = 94.85 dB μ V/m
 Fundamental field strength at Low Channel GFSK = 93.45 dB μ V/m
 Fundamental field strength at High Channel GFSK = 94.09 dB μ V/m
 Fundamental field strength at Low Channel GFSK (BT BR) = 91.06 dB μ V/m
 Fundamental field strength at High Channel GFSK (BT BR) = 94.34 dB μ V/m

Minimum delta based on 15.249 limits:

Low Channel minimum delta GMSK = 92.69 – 54.0 dB μ V/m = 38.69 dBc
 High Channel minimum delta GMSK = 94.85 – 54.0 dB μ V/m = 40.85 dBc
 Low Channel minimum delta GFSK = 93.45 – 54.0 dB μ V/m = 39.45 dBc
 High Channel minimum delta GFSK = 94.09 – 54.0 dB μ V/m = 40.09 dBc
 Low Channel minimum delta GFSK (BT BR) = 91.06 – 54.0 dB μ V/m = 37.06 dBc
 High Channel minimum delta GFSK (BT BR) = 94.34 – 54.0 dB μ V/m = 40.34 dBc

FCC Part 15.249 requires the attenuation of all emissions outside of the specified band to be at least 50 dB or below the 15.209 limits, whichever is the lesser. In this case, the 15.209 limits were the lesser and used to show compliance.

At these frequencies, the limits from 15.209 is 54.00 dB μ V/m. So it is sufficient to show compliance with the 15.209 limits instead of the requirement to be 50 dB below.

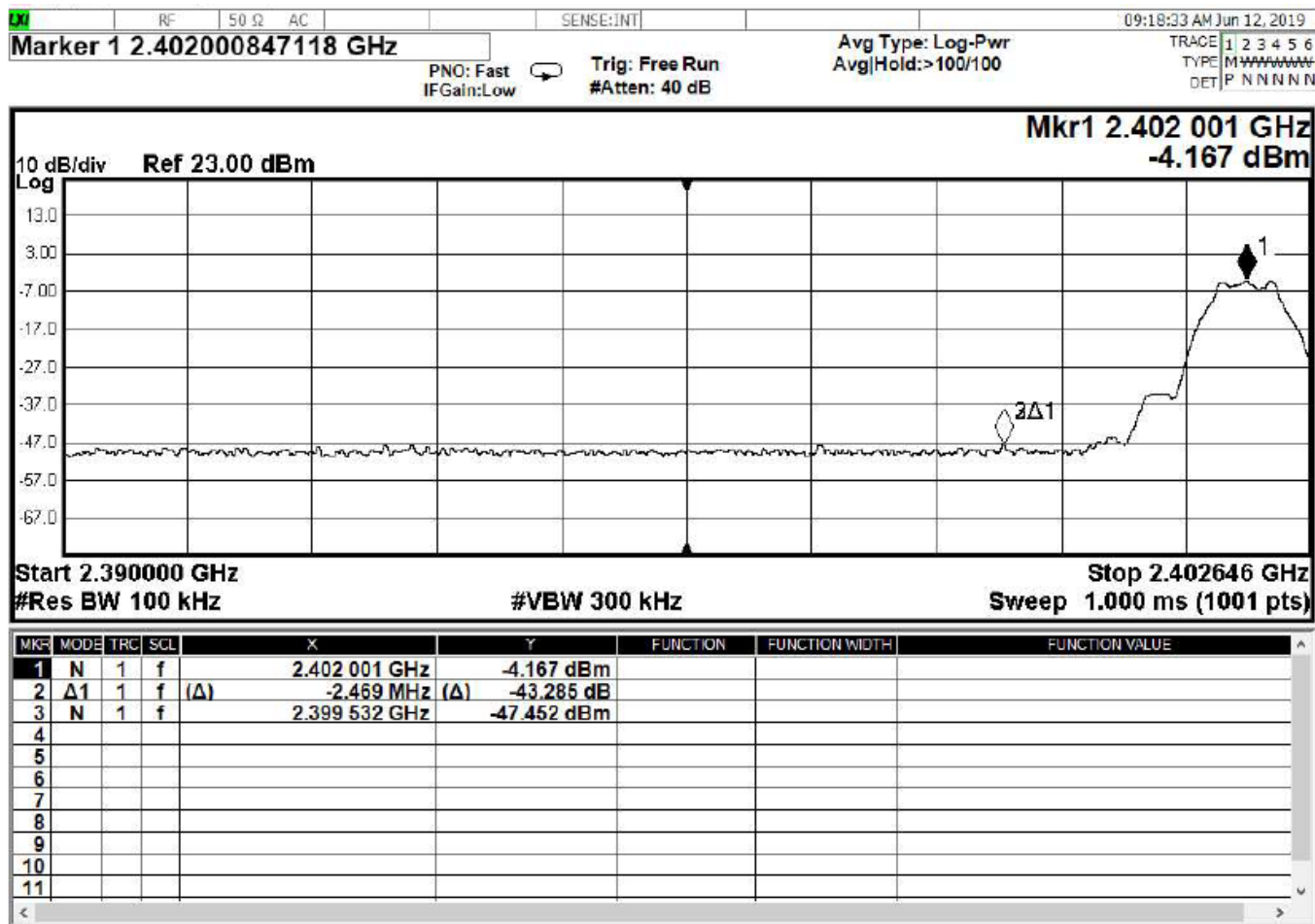


Figure 25 - Band Edge, Low Channel, Unrestricted, GMSK

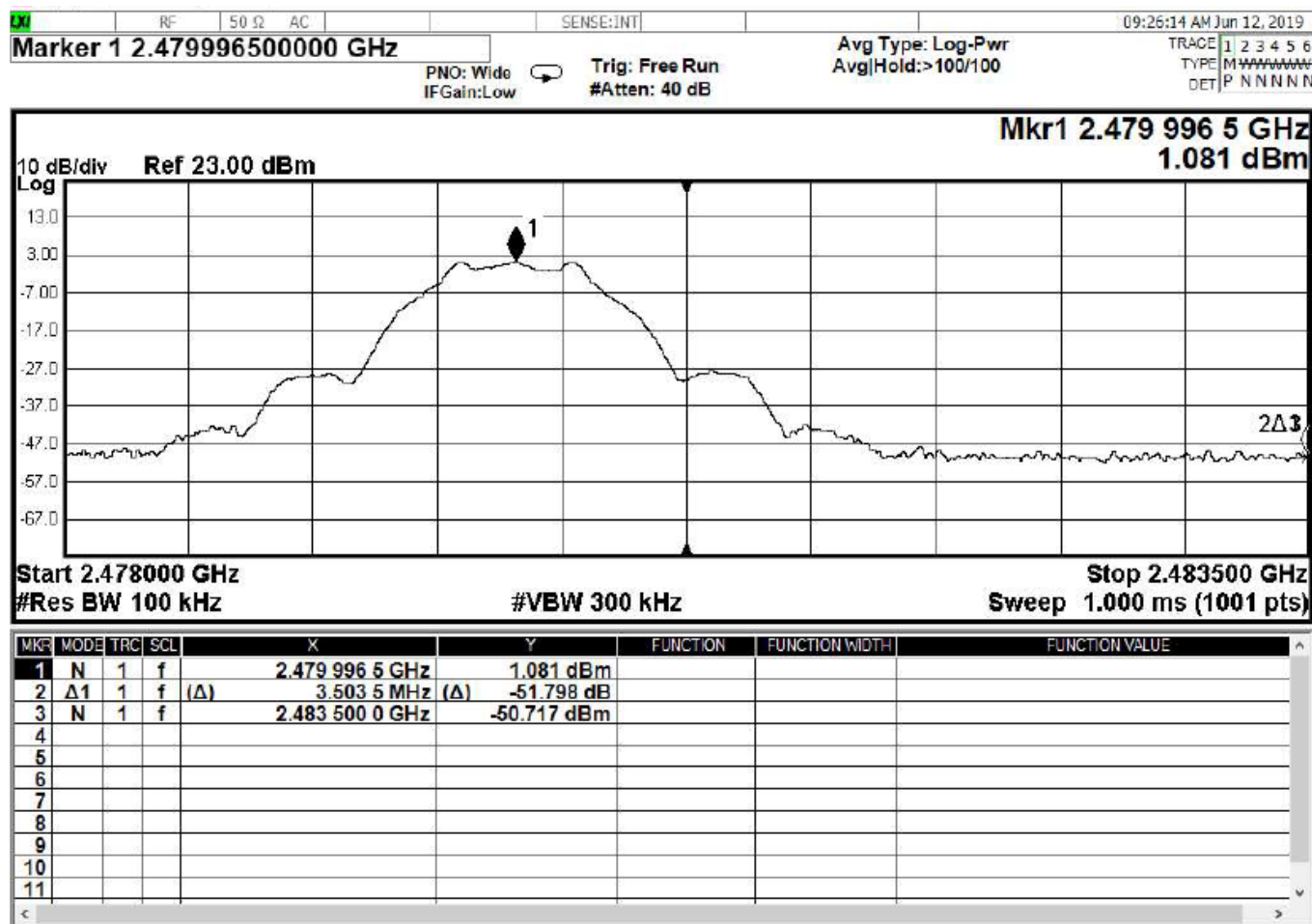


Figure 26 –Band Edge Measurement, High Channel, Unrestricted, GMSK

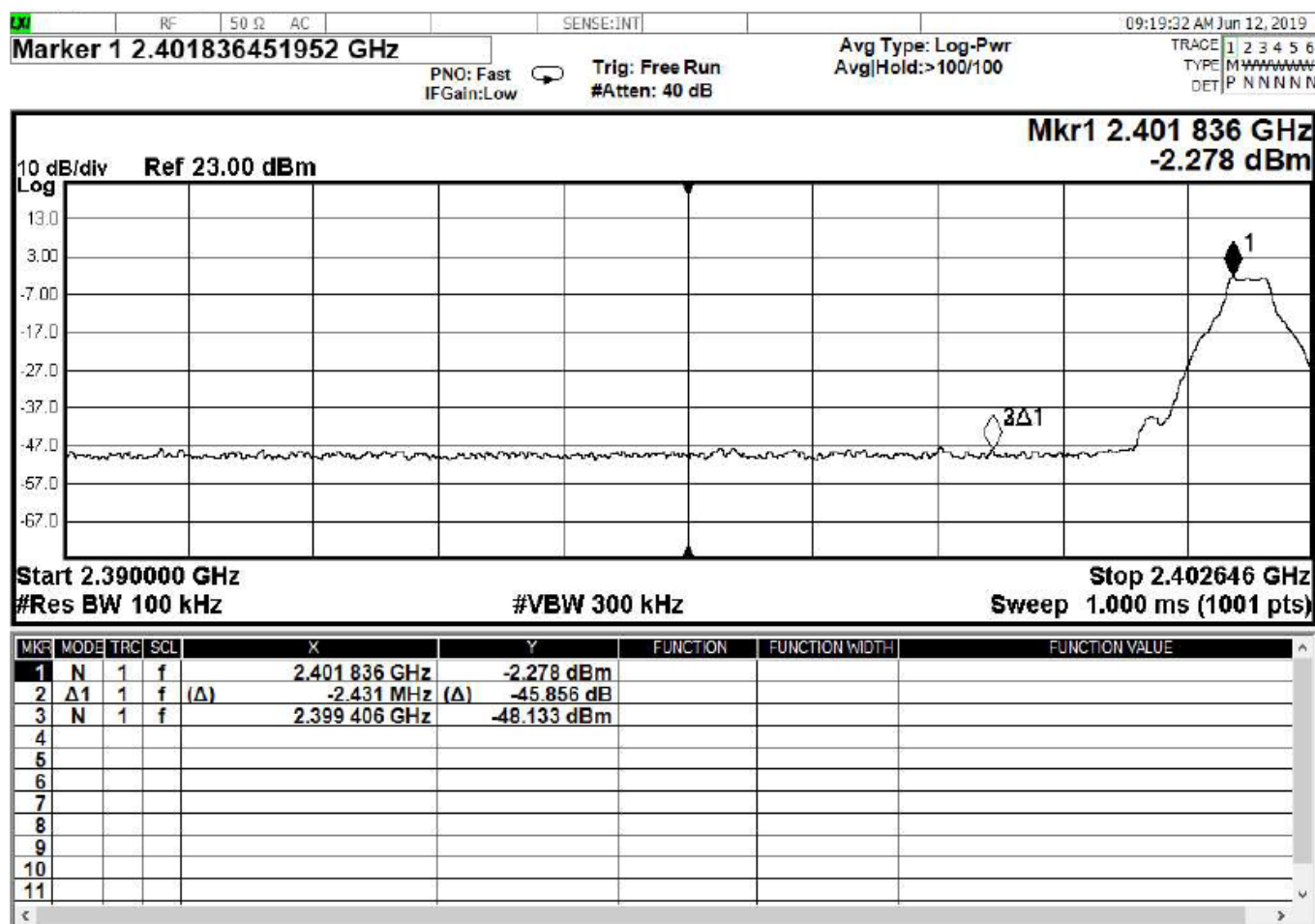


Figure 27 –Band Edge, Low Channel, Unrestricted, GFSK

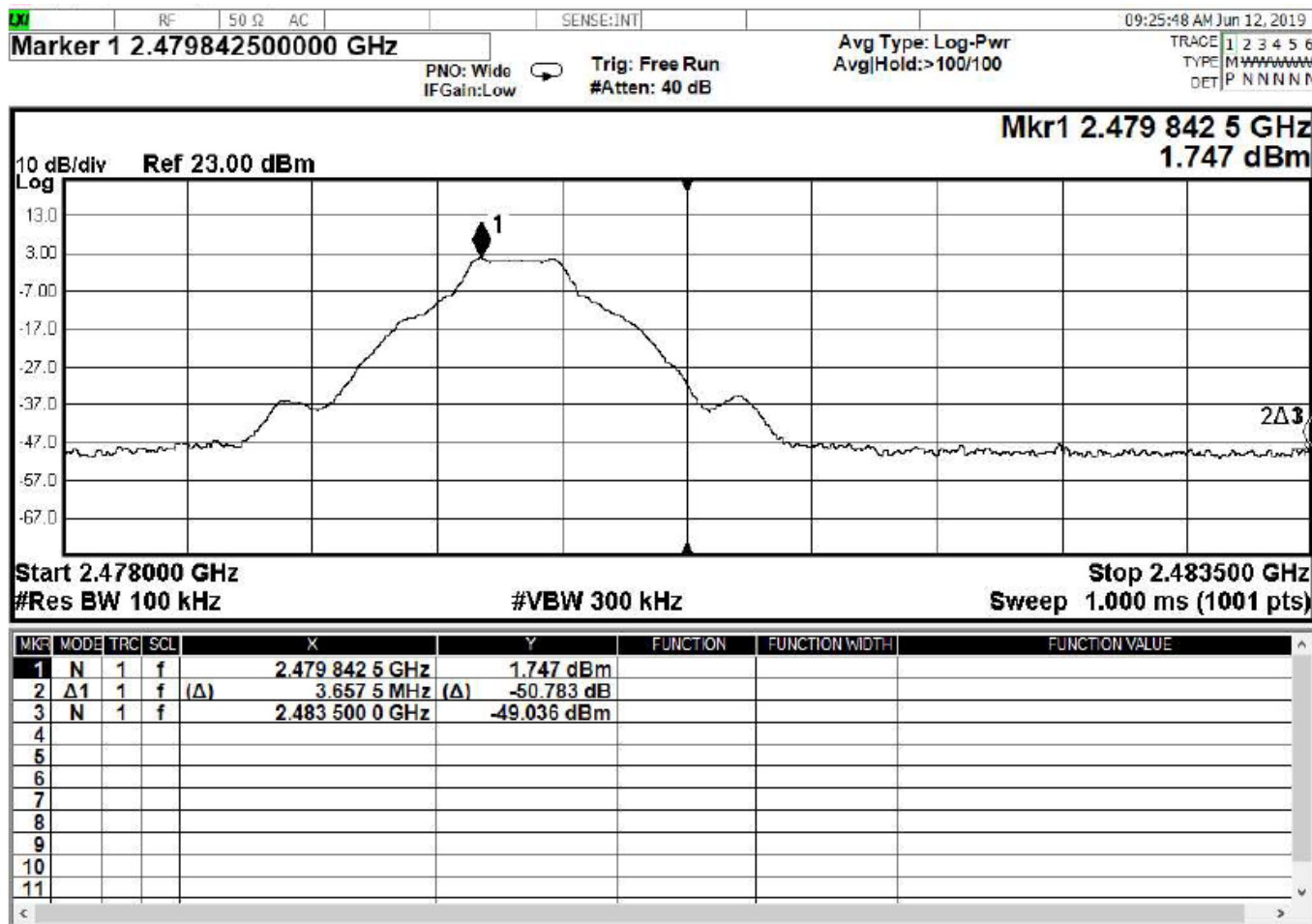


Figure 28 – Band Edge Measurement, High Channel, Unrestricted, GFSK

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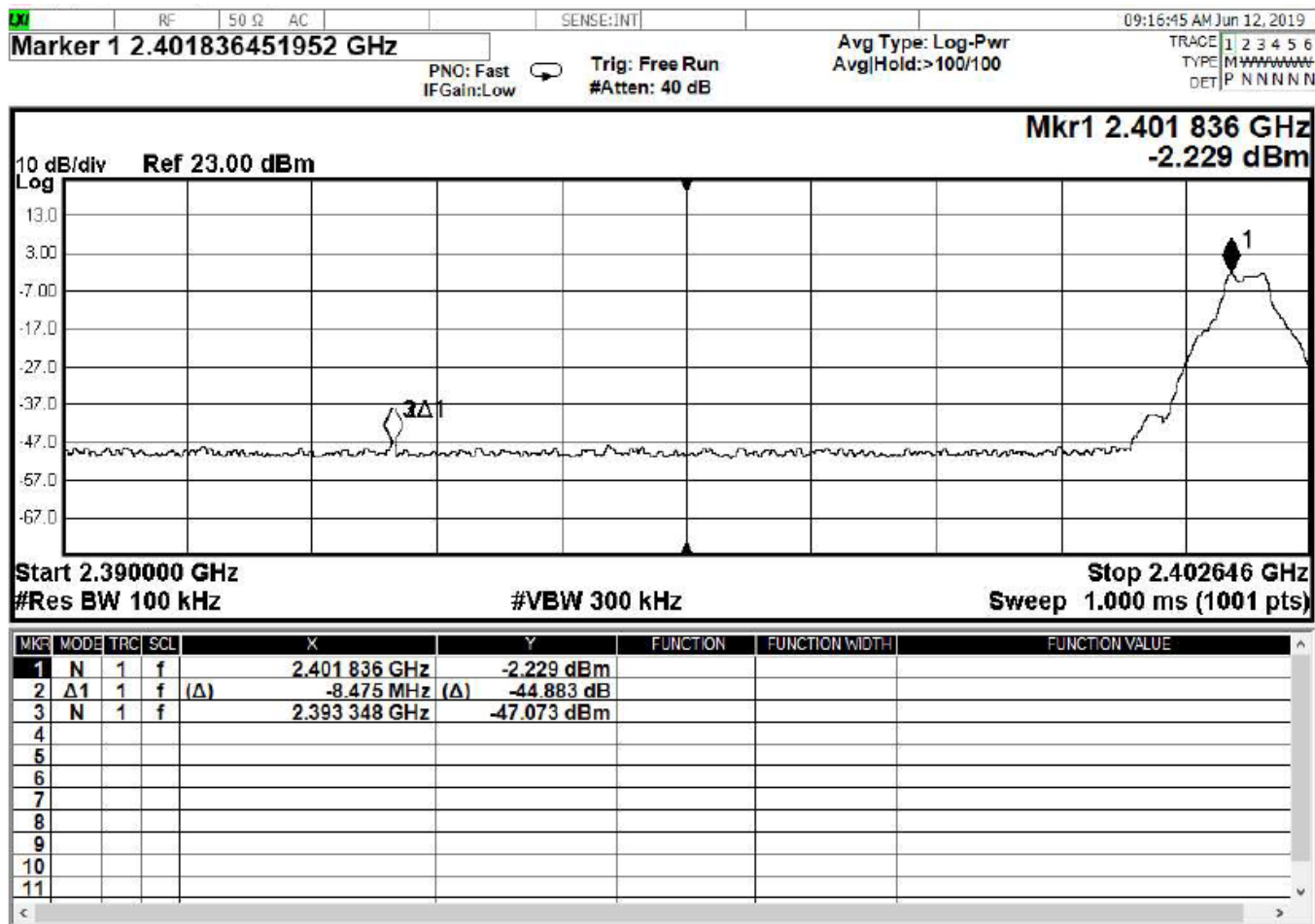


Figure 29 - Band Edge, Low Channel, Unrestricted, GFSK (BT BR)

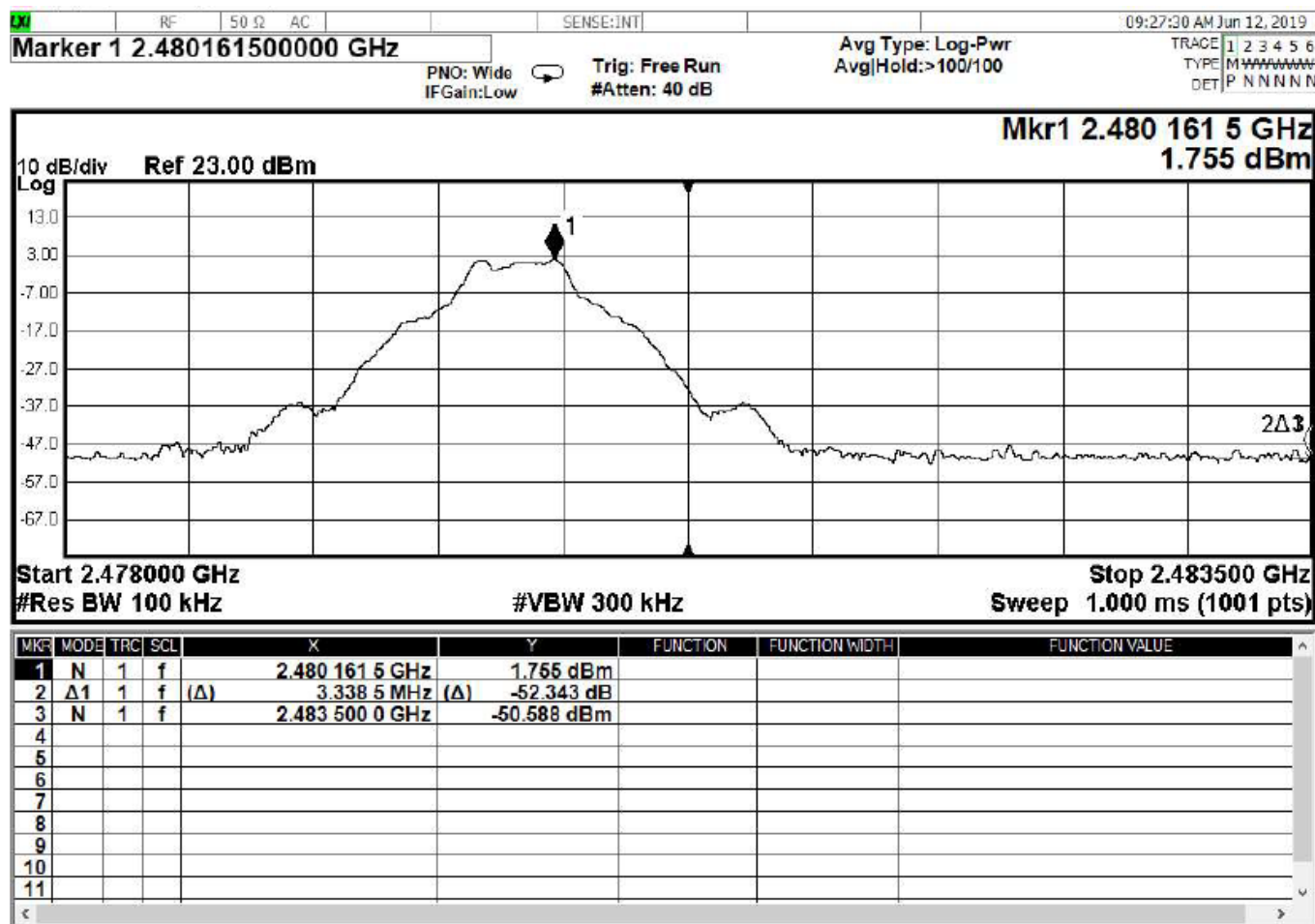


Figure 30 –Band Edge Measurement, High Channel, Unrestricted, GFSK (BT BR)

4.6 CONDUCTED AC MAINS EMISSIONS

Test Method: ANSI C63.10-2013, Section(s) 6.2

Limits for conducted emissions measurements:

FREQUENCY OF EMISSION (MHz)	CONDUCTED LIMIT (dB μ V)	
	Quasi-peak	Average
0.15-0.5	66 to 56	56 to 46
0.5-5	56	46
5-30	60	50

Notes:

1. The lower limit shall apply at the transition frequencies.
2. The limit decreases in line with the logarithm of the frequency in the range of 0.15 to 0.50 MHz
3. All emanations from a class A/B digital device or system, including any network of conductors and apparatus connected thereto, shall not exceed the level of field strengths specified above.

Test Procedures:

- a. The EUT was placed 0.8m above a ground reference plane and 0.4 meters from the conducting wall of a shielded room with EUT being connected to the power mains through a line impedance stabilization network (LISN). The LISN provides 50 ohm/ 50uH of coupling impedance for the measuring instrument.
- b. Both lines of the power mains connected to the EUT were checked for maximum conducted interference as well as the ground.
- c. The frequency range from 150 kHz to 30 MHz was searched. Emission levels over 10dB under the prescribed limits are not reported.
- d. Results were compared to the 15.207 limits.

Deviation from the test standard:

No deviation

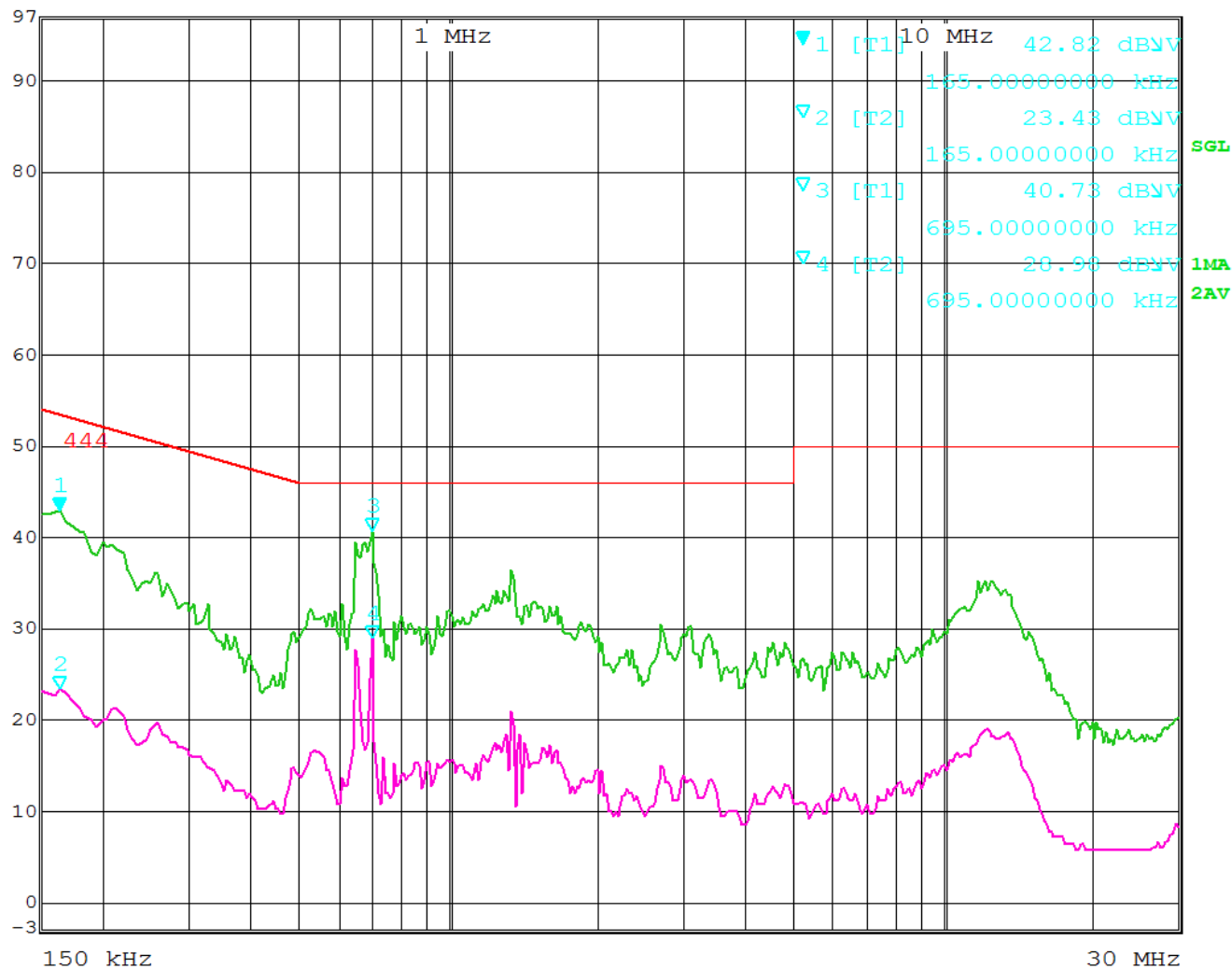
EUT operating conditions:

The EUT was powered by 5 VDC unless specified and set to transmit continuously on the middle channel.

Test Results:



Marker 1 [T1] Det AV Trd ES-K1
Att 10 dB AUTO 42.82 dBV ResBW 9 kHz
INPUT 2 165.0000000 kHz Meas T 100 ms Unit dBV



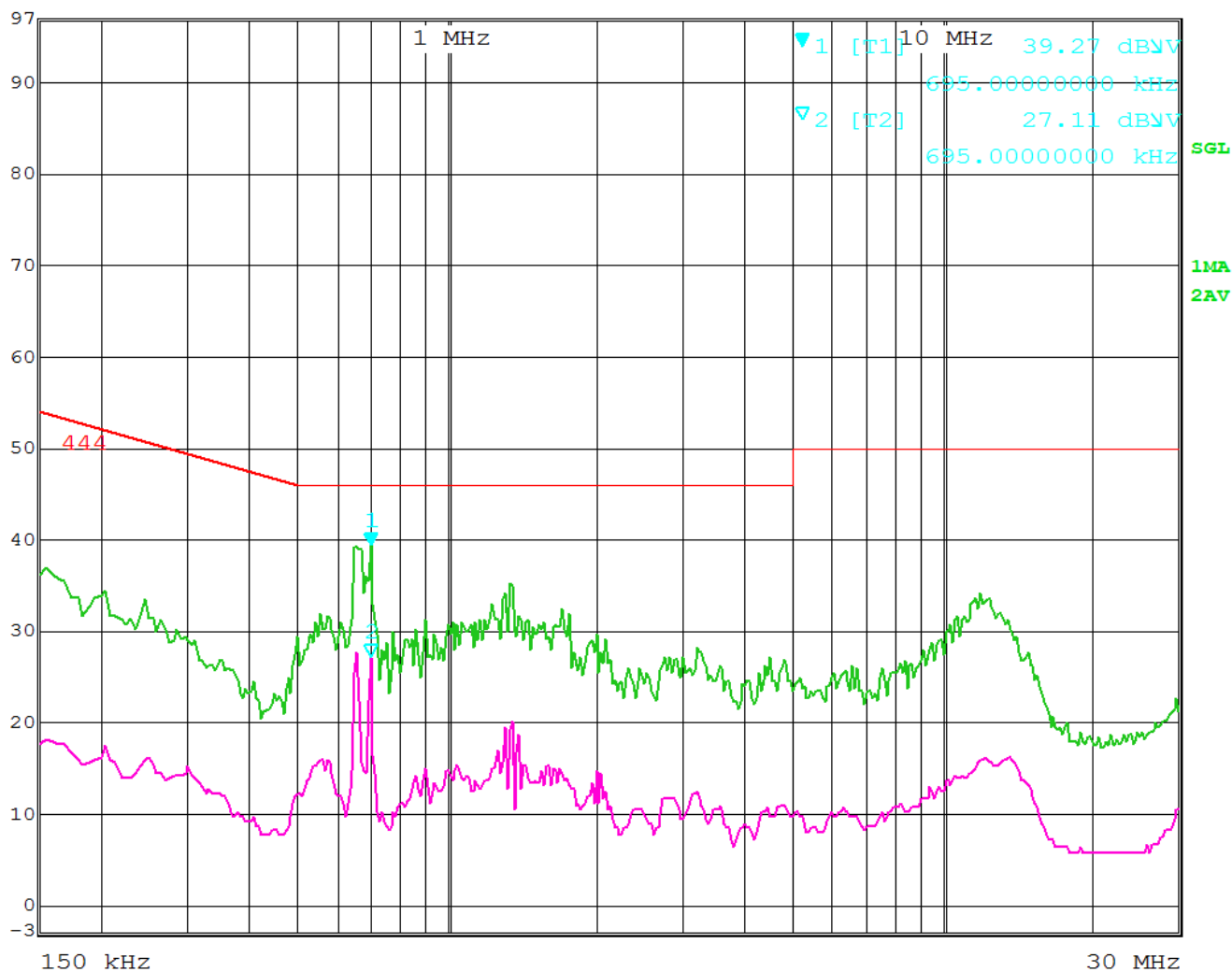
Date: 14.JUN.2019 15:31:19

Figure 31 - Conducted Emissions Plot, L-F

All Measurements were found to be at least 10 dB below the limits.



Marker 1 [T1] Det AV Trd ES-K1
Att 10 dB AUTO 39.27 dBV ResBW 9 kHz
INPUT 2 695.00000000 kHz Meas T 100 ms Unit dBV



Date: 14.JUN.2019 15:41:05

Figure 32 - Conducted Emissions Plot, N-F

All Measurements were found to be at least 10 dB below the limits.



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APPENDIX A: SAMPLE CALCULATION

Field Strength Calculation

The field strength is calculated by adding the Antenna Factor and Cable Factor, and subtracting the Amplifier Gain (if any) from the measured reading. The basic equation with a sample calculation is as follows:

$$FS = RA + AF - (-CF + AG) + AV$$

where FS = Field Strength

RA = Receiver Amplitude

AF = Antenna Factor

CF = Cable Attenuation Factor

AG = Amplifier Gain

AV = Averaging Factor (if applicable)

Assume a receiver reading of 55 dB μ V is obtained. The Antenna Factor of 12 and a Cable Factor of 1.1 is added. The Amplifier Gain of 20 dB is subtracted, giving a field strength of 48.1 dB μ V/m.

$$FS = 55 + 12 - (-1.1 + 20) + 0 = 48.1 \text{ dB}\mu\text{V/m}$$

The 48.1 dB μ V/m value can be mathematically converted to its corresponding level in μ V/m.

$$\text{Level in } \mu\text{V/m} = \text{Common Antilogarithm} [(48.1 \text{ dB}\mu\text{V/m})/20] = 254.1 \mu\text{V/m}$$

AV is calculated by taking the $20 \cdot \log(T_{\text{on}}/100)$ where T_{on} is the maximum transmission time in any 100ms window.



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EIRP Calculations

In cases where direct antenna port measurement is not possible or would be inaccurate, output power is measured in EIRP. The maximum field strength is measured at a specified distance and the EIRP is calculated using the following equation;

$$EIRP \text{ (Watts)} = [Field \text{ Strength (V/m)} \times \text{antenna distance (m)}]^2 / 30$$

$$\text{Power (watts)} = 10^{[Power \text{ (dBm)}/10]} / 1000$$

$$\text{Voltage (dB}\mu\text{V)} = \text{Power (dBm)} + 107 \text{ (for } 50\Omega \text{ measurement systems)}$$

$$\text{Field Strength (V/m)} = 10^{[\text{Field Strength (dB}\mu\text{V/m)} / 20]} / 10^6$$

$$\text{Gain} = 1 \text{ (numeric gain for isotropic radiator)}$$

Conversion from 3m field strength to EIRP (d=3):

$$EIRP = [FS(V/m) \times d^2]/30 = FS [0.3] \quad \text{for } d = 3$$

$$EIRP(dBm) = FS(dB\mu V/m) - 10(\log 10^9) + 10\log[0.3] = FS(dB\mu V/m) - 95.23$$

$10\log(10^9)$ is the conversion from micro to milli



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APPENDIX B – MEASUREMENT UNCERTAINTY

Where relevant, the following measurement uncertainty levels have been for tests performed in this test report:

Test	Frequency Range	Uncertainty Value (dB)
Radiated Emissions, 3m	30MHz - 1GHz	3.82
Radiated Emissions, 3m	1GHz - 18GHz	4.44
Emissions limits, conducted	30MHz – 18GHz	±3.30 dB

Expanded uncertainty values are calculated to a confidence level of 95%.



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REPORT END

RF Exposure Lab

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CERTIFICATE OF COMPLIANCE SAR EVALUATION

Garmin International, Inc.
1200 E. 151st Street
Olathe, KS 66062

Dates of Test:
Test Report Number:

June 21, 2019
SAR.20190617

FCC ID:	IPH-A3556
IC Certificate:	1792A-A3556
Model(s):	AA3556
Test Sample:	Engineering Unit Same as Production
Serial Number:	Eng 1
Equipment Type:	Wireless GPS Location Device
Classification:	Portable Transmitter Next to Body
TX Frequency Range:	2412 – 2462 MHz
Frequency Tolerance:	± 2.5 ppm
Maximum RF Output:	2450 MHz (b) – 19.0 dBm, 2450 MHz (g) – 18.0 dBm, 2450 MHz (n20) – 18.0 dBm
Signal Modulation:	Conducted DSSS, OFDM
Antenna Type:	Internal
Application Type:	Certification
FCC Rule Parts:	Part 2, 15C, 15E
KDB Test Methodology:	KDB 447498 D01 v06, KDB 248227 v02r02
Industry Canada:	RSS-102 Issue 5, Safety Code 6
Maximum SAR Value:	0.02 W/kg Reported
Separation Distance:	0 mm

This wireless mobile and/or portable device has been shown to be compliant for localized specific absorption rate (SAR) for uncontrolled environment/general exposure limits specified in ANSI/IEEE Std. C95.1-1992 and had been tested in accordance with the measurement procedures specified in IEEE 1528-2013 and IEC 62209-2:2010 (See test report).

I attest to the accuracy of the data. All measurements were performed by myself or were made under my supervision and are correct to the best of my knowledge and belief. I assume full responsibility for the completeness of these measurements and vouch for the qualifications of all persons taking them.

RF Exposure Lab, LLC certifies that no party to this application is subject to a denial of Federal benefits that includes FCC benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. 853(a).



Jay M. Moulton
Vice President



Testing Cert. # 2387.01

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Comment/Revision	Date
Original Release	June 24, 2019

1. Introduction

This measurement report shows compliance of the Garmin International, Inc. Model AA3556 FCC ID: IPH-A3556 with FCC Part 2, 1093, ET Docket 93-62 Rules and IC Certificate: 1792A-A3556 with RSS102 Issue 5 & Safety Code 6 for mobile and portable devices. The FCC has adopted the guidelines for evaluating the environmental effects of radio frequency radiation in ET Docket 93-62 on August 6, 1996 to protect the public and workers from the potential hazards of RF emissions due to FCC regulated portable devices. [1], [6]

The test results recorded herein are based on a single type test of Garmin International, Inc. Model AA3556 and therefore apply only to the tested sample.

The test procedures, as described in ANSI C95.1 – 1999 Standard for Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 kHz to 300 GHz [2], ANSI C95.3 – 2002 Recommended Practice for the Measurement of Potentially Hazardous Electromagnetic Fields [3], IEEE Std.1528 – 2013 Recommended Practice [5], and Industry Canada Safety Code 6 Limits of Human Exposure to Radiofrequency Electromagnetic Fields in the Frequency Range from 3kHz to 300 GHz were employed.

The following table indicates all the wireless technologies operating in the AA3556 Wireless GPS Location Device. The table also shows the tolerance for the power level for each mode.

Band	Modulation	Calibrated Nominal Power dBm	Tolerance dBm	Lower Tolerance dBm	Upper Tolerance dBm
2450 MHz	802.11b	N/A	N/A	N/A	19.0
2450 MHz	802.11gn20	N/A	N/A	N/A	18.0

SAR Definition [5]

Specific Absorption Rate is defined as the time derivative (rate) of the incremental energy (dW) absorbed by (dissipated in) an incremental mass (dm) contained in a volume element (dV) of a given density (ρ).

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

SAR is expressed in units of watts per kilogram (W/kg). SAR can be related to the electric field at a point by

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

where:

σ = conductivity of the tissue (S/m)

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

E = rms electric field strength (V/m)

2. SAR Measurement Setup

Robotic System

These measurements are performed using the DASY52 automated dosimetric assessment system. The DASY52 is made by Schmid & Partner Engineering AG (SPEAG) in Zurich, Switzerland and consists of high precision robotics system (Staubli), robot controller, Intel Core2 computer, near-field probe, probe alignment sensor, and the generic twin phantom containing the brain equivalent material. The robot is a six-axis industrial robot performing precise movements to position the probe to the location (points) of maximum electromagnetic field (EMF) (see Fig. 2.1).

System Hardware

A cell controller system contains the power supply, robot controller teach pendant (Joystick), and a remote control used to drive the robot motors. The PC consists of the HP Intel Core2 computer with Windows XP system and SAR Measurement Software DASY52, A/D interface card, monitor, mouse, and keyboard. The Staubli Robot is connected to the cell controller to allow software manipulation of the robot. A data acquisition electronic (DAE) circuit that 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 into digital electric signal of the DAE and transfers data to the PC plug-in card.

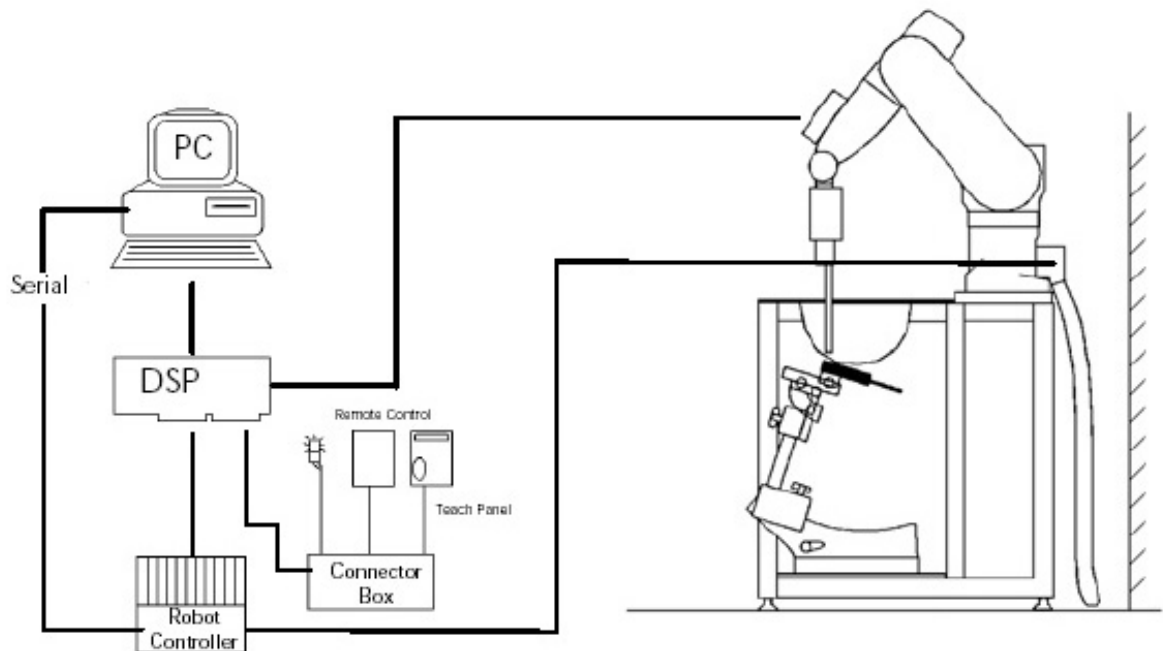


Figure 2.1 SAR Measurement System Setup

System Electronics

The DAE4 consists of a highly sensitive electrometer-grade preamplifier with auto-zeroing, a channel and gain-switching multiplexer, a fast 16 bit AD-converter and a command decoder and control logic unit. Transmission to the PC-card 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. They are also used for mechanical surface detection and probe collision detection. The robot uses its own controller with a built in VME-bus computer. The system is described in detail in.

Probe Measurement System

The SAR measurements were conducted with the dosimetric probe EX3DV4, designed in the classical triangular configuration (see Fig. 2.2) and optimized for dosimetric evaluation. The probe is constructed using the thick film technique; with printed resistive lines on ceramic substrates. The probe is equipped with an optical multi fiber line ending at the front of the probe tip. (see Fig. 2.3) It is connected to the EOC box on the robot arm and provides an automatic detection of the phantom surface. Half of the fibers are connected to a pulsed infrared transmitter, the other half to a synchronized receiver. As the probe approaches the surface, the reflection from the surface produces a coupling from the transmitting to the receiving fibers. This reflection increases first during the approach, reaches maximum and then decreases. If the probe is flatly touching the surface, the coupling is zero. The distance of the coupling maximum to the surface is independent of the surface reflectivity and largely independent of the surface to probe angle. The DASY52 software reads the reflection during a software approach and looks for the maximum using a 2nd order fitting. The approach is stopped at reaching the maximum.



DAE System

Probe Specifications

Calibration: In air from 10 MHz to 6.0 GHz
In brain and muscle simulating tissue at Frequencies of 450 MHz, 835 MHz, 1750 MHz, 1900 MHz, 2450 MHz, 2600 MHz, 3500 MHz, 5200 MHz, 5300 MHz, 5600 MHz, 5800 MHz

Frequency: 10 MHz to 6 GHz

Linearity: $\pm 0.2\text{dB}$ (30 MHz to 6 GHz)

Dynamic: 10 mW/kg to 100 W/kg

Range: Linearity: $\pm 0.2\text{dB}$

Dimensions: Overall length: 330 mm

Tip length: 20 mm

Body diameter: 12 mm

Tip diameter: 2.5 mm

Distance from probe tip to sensor center: 1 mm

Application: SAR Dosimetry Testing
Compliance tests of wireless device

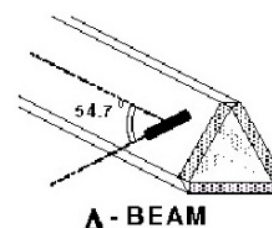


Figure 2.2 Triangular Probe Configurations



Figure 2.3 Probe Thick-Film Technique

Probe Calibration Process

Dosimetric Assessment Procedure

Each probe is calibrated according to a dosimetric assessment procedure described in with accuracy better than +/- 10%. The spherical isotropy was evaluated with the procedure described in and found to be better than +/-0.25dB. The sensitivity parameters (Norm X, Norm Y, Norm Z), the diode compression parameter (DCP) and the conversion factor (Conv F) of the probe is tested.

Free Space Assessment

The free space E-field from amplified probe outputs is determined in a test chamber. This is performed in a TEM cell for frequencies below 1 GHz, and in a waveguide above 1GHz for free space. For the free space calibration, the probe is placed in the volumetric center of the cavity at the proper orientation with the field. The probe is then rotated 360 degrees until the three channels show the maximum reading. The power density readings equates to 1 mW/cm².

Temperature Assessment *

E-field temperature correlation calibration is performed in a flat phantom filled with the appropriate simulated brain tissue. The measured free space E-field in the medium, correlates to temperature rise in a dielectric medium. For temperature correlation calibration a RF transparent thermistor based temperature probe is used in conjunction with the E-field probe

$$SAR = C \frac{\Delta T}{\Delta t}$$

where:

Δt = exposure time (30 seconds),

C = heat capacity of tissue (brain or muscle),

ΔT = temperature increase due to RF exposure.

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

where:

σ = simulated tissue conductivity,

ρ = Tissue density (1.25 g/cm³ for brain tissue)

SAR is proportional to $\Delta T / \Delta t$, the initial rate of tissue heating, before thermal diffusion takes place.

Now it's possible to quantify the electric field in the simulated tissue by equating the thermally derived SAR to the E- field;

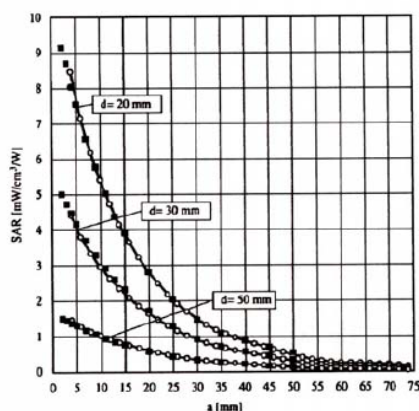


Figure 2.4 E-Field and Temperature Measurements at 900MHz

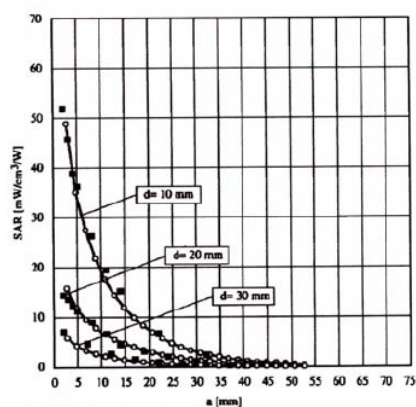


Figure 2.5 E-Field and Temperature Measurements at 1800MHz

Data Extrapolation

The DASY52 software automatically executes the following procedures to calculate the field units from the microvolt readings at the probe connector. The first step of the evaluation is a linearization of the filtered input signal to account for the compression characteristics of the detector diode. The compensation depends on the input signal, the diode type and the DC-transmission factor from the diode to the evaluation electronics. If the exciting field is pulsed, the crest factor of the signal must be known to correctly compensate for peak power. The formula for each channel can be given like below;

$$V_i = U_i + U_i^2 \cdot \frac{cf}{dcp_i}$$

with V_i = compensated signal of channel i (i=x,y,z)
 U_i = input signal of channel i (i=x,y,z)
 cf = crest factor of exciting field (DASY parameter)
 dcp_i = diode compression point (DASY parameter)

From the compensated input signals the primary field data for each channel can be evaluated:

E-field probes:

$$E_i = \sqrt{\frac{V_i}{Norm_i \cdot ConvF}}$$

with V_i = compensated signal of channel i (i = x,y,z)
 $Norm_i$ = sensor sensitivity of channel i (i = x,y,z)
 $\mu V/(V/m)^2$ for E-field probes
 $ConvF$ = sensitivity of enhancement in solution
 E_i = electric field strength of channel i in V/m

The RSS value of the field components gives the total field strength (Hermetian magnitude):

$$E_{tot} = \sqrt{E_x^2 + E_y^2 + E_z^2}$$

The primary field data are used to calculate the derived field units.

$$SAR = E_{tot}^2 \cdot \frac{\sigma}{\rho \cdot 1000}$$

with SAR = local specific absorption rate in W/g
 E_{tot} = total field strength in V/m
 σ = conductivity in [mho/m] or [Siemens/m]
 ρ = equivalent tissue density in g/cm³

The power flow density is calculated assuming the excitation field to be a free space field.

$$P_{free} = \frac{E_{tot}^2}{3770}$$

with P_{pwe} = equivalent power density of a plane wave in W/cm²
 E_{tot} = total electric field strength in V/m

Scanning procedure

- The DASY installation includes predefined files with recommended procedures for measurements and system check. They are read-only document files and destined as fully defined but unmeasured masks. All test positions (head or body-worn) are tested with the same configuration of test steps differing only in the grid definition for the different test positions.
- The „reference“ and „drift“ measurements are located at the beginning and end of the batch process. They measure the field drift at one single point in the liquid over the complete procedure. The indicated drift is mainly the variation of the DUT's output power and should vary max. +/- 5 %.
- The highest integrated SAR value is the main concern in compliance test applications. These values can mostly be found at the inner surface of the phantom and cannot be measured directly due to the sensor offset in the probe. To extrapolate the surface values, the measurement distances to the surface must be known accurately. A distance error of 0.5mm could produce SAR errors of 6% at 1800 MHz. Using predefined locations for measurements is not accurate enough. Any shift of the phantom (e.g., slight deformations after filling it with liquid) would produce high uncertainties. For an automatic and accurate detection of the phantom surface, the DASY5 system uses the mechanical surface detection. The detection is always at touch, but the probe will move backward from the surface the indicated distance before starting the measurement.
- The „area scan“ measures the SAR above the DUT or verification dipole on a parallel plane to the surface. It is used to locate the approximate location of the peak SAR with 2D spline interpolation. The robot performs a stepped movement along one grid axis while the local electrical field strength is measured by the probe. The probe is touching the surface of the SAM during acquisition of measurement values. The scan uses different grid spacings for different frequency measurements. Standard grid spacing for head measurements in frequency ranges ≤ 2 GHz is 15 mm in x - and y-dimension. For higher frequencies a finer resolution is needed, thus for the grid spacing is reduced according the following table:

Area scan grid spacing for different frequency ranges	
Frequency range	Grid spacing
≤ 2 GHz	≤ 15 mm
2 – 4 GHz	≤ 12 mm
4 – 6 GHz	≤ 10 mm

Grid spacing and orientation have no influence on the SAR result. For special applications where the standard scan method does not find the peak SAR within the grid, e.g. mobile phones with flip cover, the grid can be adapted in orientation. Results of this coarse scan are shown in annex B.

- A „zoom scan” measures the field in a volume around the 2D peak SAR value acquired in the previous „coarse” scan. It uses a fine meshed grid where the robot moves the probe in steps along all the 3 axis (x,y and z-axis) starting at the bottom of the Phantom. The grid spacing for the cube measurement is varied according to the measured frequency range, the dimensions are given in the following table:

Zoom scan grid spacing and volume for different frequency ranges			
Frequency range	Grid spacing for x, y axis	Grid spacing for z axis	Minimum zoom scan volume
≤ 2 GHz	≤ 8 mm	≤ 5 mm	≥ 30 mm
2 – 3 GHz	≤ 5 mm	≤ 5 mm	≥ 28 mm
3 – 4 GHz	≤ 5 mm	≤ 4 mm	≥ 28 mm
4 – 5 GHz	≤ 4 mm	≤ 3 mm	≥ 25 mm
5 – 6 GHz	≤ 4 mm	≤ 2 mm	≥ 22 mm

DASY is also able to perform repeated zoom scans if more than 1 peak is found during area scan. In this document, the evaluated peak 1g and 10g averaged SAR values are shown in the 2D-graphics in annex B. Test results relevant for the specified standard (see section 3) are shown in table form in section 7.

Spatial Peak SAR Evaluation

The spatial peak SAR - value for 1 and 10 g is evaluated after the Cube measurements have been done. The basis of the evaluation are the SAR values measured at the points of the fine cube grid consisting of all points in the three directions x, y and z. The algorithm that finds the maximal averaged volume is separated into three different stages.

- The data between the dipole center of the probe and the surface of the phantom are extrapolated. This data cannot be measured since the center of the dipole is 1 to 2.7 mm away from the tip of the probe and the distance between the surface and the lowest measuring point is about 1 mm (see probe calibration sheet). The extrapolated data from a cube measurement can be visualized by selecting 'Graph Evaluated'.
- The maximum interpolated value is searched with a straight-forward algorithm. Around this maximum the SAR - values averaged over the spatial volumes (1g or 10 g) are computed using the 3d-spline interpolation algorithm. If the volume cannot be evaluated (i.e., if a part of the grid was cut off by the boundary of the measurement area) the evaluation will be started on the corners of the bottom plane of the cube.
- All neighbouring volumes are evaluated until no neighbouring volume with a higher average value is found.

Extrapolation

The extrapolation is based on a least square algorithm [W. Gander, Computermathematik, p.168-180]. Through the points in the first 3 cm along the z-axis, polynomials of order four are calculated. These polynomials are then used to evaluate the points between the surface and the probe tip. The points, calculated from the surface, have a distance of 1 mm from each other.

Interpolation

The interpolation of the points is done with a 3d-Spline. The 3d-Spline is composed of three one-dimensional splines with the "Not a knot"-condition [W. Gander, Computermathematik, p.141-150] (x, y and z -direction) [Numerical Recipes in C, Second Edition, p.123ff].

Volume Averaging

At First the size of the cube is calculated. Then the volume is integrated with the trapezoidal algorithm. 8000 points (20x20x20) are interpolated to calculate the average.

Advanced Extrapolation

DASY uses the advanced extrapolation option which is able to compensate boundary effects on E-field probes.

SAM PHANTOM

The SAM Twin Phantom V4.0 is constructed of a fiberglass shell integrated in a wooden table. The shape of the shell is based on data from an anatomical study designed to determine the maximum exposure in at least 90% of all users. It enables the dosimetric evaluation of left and right hand phone usage as well as body mounted usage at the flat phantom region. A cover prevents the evaporation of the liquid. Reference markings on the Phantom allow the complete setup of all predefined phantom positions and measurement grids by manually teaching three points in the robot. (see Fig. 2.6)

Phantom Specification

Phantom:	SAM Twin Phantom (V4.0)
Shell Material:	Vivac Composite
Thickness:	2.0 ± 0.2 mm

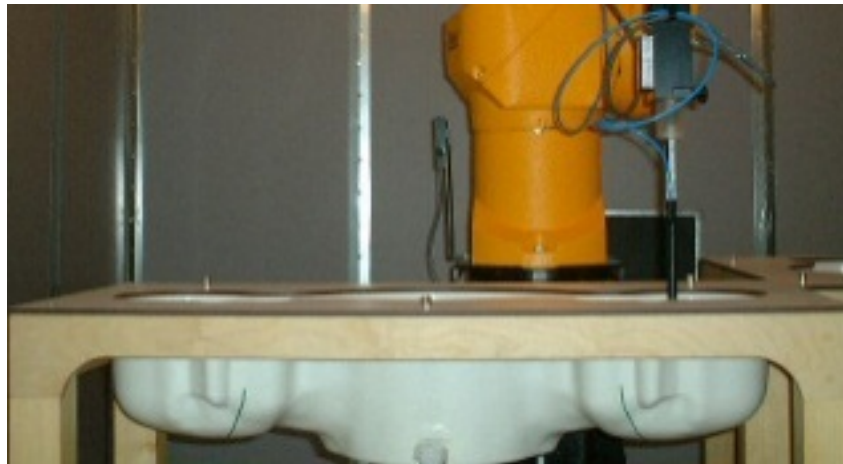


Figure 2.6 SAM Twin Phantom

Device Holder for Transmitters

In combination with the SAM Twin Phantom V4.0 the Mounting Device (see Fig. 2.7), enables the rotation of the mounted transmitter in spherical coordinates whereby the rotation point is the ear opening. The devices can be easily, accurately, and repeatedly be positioned according to the FCC, CENELEC, IEC and IEEE specifications. The device holder can be locked at different phantom locations (left head, right head, flat phantom).



Figure 2.7 Mounting Device

Note: A simulating human hand is not used due to the complex anatomical and geometrical structure of the hand that may produce infinite number of configurations. To produce the worst-case condition (the hand absorbs antenna output power), the hand is omitted during the tests.

3. Probe and Dipole Calibration

See Appendix D and E.

4. Phantom & Simulating Tissue Specifications

Head & Body Simulating Mixture Characterization

The head and body mixtures consist of the material based on the table listed below. The mixture is calibrated to obtain proper dielectric constant (permittivity) and conductivity of the desired tissue. Body tissue parameters that have not been specified in IEEE1528 – 2013 are derived from the issue dielectric parameters computed from the 4-Cole-Cole equations.

Table 4.1 Typical Composition of Ingredients for Tissue

Ingredients		Simulating Tissue
		2450 MHz Body
Mixing Percentage		
Water		73.20
Sugar		0.00
Salt		0.04
HEC		0.00
Bactericide		0.00
DGBE		26.70
Dielectric Constant	Target	52.70
Conductivity (S/m)	Target	1.95

5. ANSI/IEEE C95.1 – 1992 RF Exposure Limits [2]

Uncontrolled Environment

Uncontrolled Environments are defined as locations where there is the exposure of individuals who have no knowledge or control of their exposure. The general population/uncontrolled exposure limits are applicable to situations in which the general public may be exposed or in which persons who are exposed as a consequence of their employment may not be made fully aware of the potential for exposure or cannot exercise control over their exposure. Members of the general public would come under this category when exposure is not employment-related; for example, in the case of a wireless transmitter that exposes persons in its vicinity.

Controlled Environment

Controlled Environments are defined as locations where there is exposure that may be incurred by persons who are aware of the potential for exposure, (i.e. as a result of employment or occupation). In general, occupational/controlled exposure limits are applicable to situations in which persons are exposed as a consequence of their employment, who have been made fully aware of the potential for exposure and can exercise control over their exposure. This exposure category is also applicable when the exposure is of a transient nature due to incidental passage through a location where the exposure levels may be higher than the general population/uncontrolled limits, but the exposed person is fully aware of the potential for exposure and can exercise control over his or her exposure by leaving the area or by some other appropriate means.

Table 5.1 Human Exposure Limits

	UNCONTROLLED ENVIRONMENT General Population (W/kg) or (mW/g)	CONTROLLED ENVIRONMENT Professional Population (W/kg) or (mW/g)
SPATIAL PEAK SAR ¹ Head	1.60	8.00
SPATIAL AVERAGE SAR ² Whole Body	0.08	0.40
SPATIAL PEAK SAR ³ Hands, Feet, Ankles, Wrists	4.00	20.00

¹ The Spatial Peak value of the SAR averaged over any 1 gram of tissue (defined as a tissue volume in the shape of a cube) and over the appropriate averaging time.

² The Spatial Average value of the SAR averaged over the whole body.

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

6. Measurement Uncertainty

Measurement uncertainty table is not required per KDB 865664 D01 v01r04 section 2.8.2 page 12. SAR measurement uncertainty analysis is required in the SAR report only when the highest measured SAR in a frequency band is ≥ 1.5 W/kg for 1-g SAR. The equivalent ratio (1.5/1.6) should be applied to extremity and occupational exposure conditions. The highest reported value is less than 1.5 W/kg. Therefore, the measurement uncertainty table is not required.

7. System Verification

Tissue Verification

Table 7.1 Measured Tissue Parameters

		2450 MHz Body	
Date(s)		Jun. 20, 2019	
Liquid Temperature (°C)	20.0	Target	Measured
Dielectric Constant: ϵ		52.70	52.58
Conductivity: σ		1.95	2.00

See Appendix A for data printout.

Test System Verification

Prior to assessment, the system is verified to the $\pm 10\%$ of the specifications at the test frequency by using the system kit. Power is normalized to 1 watt. (Graphic Plots Attached)

Table 7.2 System Dipole Verification Target & Measured

	Test Frequency	Targeted SAR _{1g} (W/kg)	Measure SAR _{1g} (W/kg)	Tissue Used for Verification	Deviation (%)	Plot Number
20-Jun-2019	2450 MHz	51.00	52.00	Body	+ 1.96	1

See Appendix A for data plots.

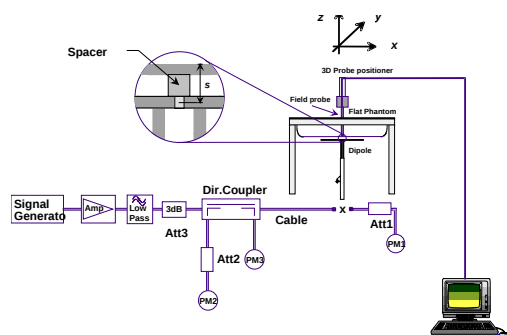


Figure 7.1 Dipole Verification Test Setup

8. SAR Test Data Summary

See Measurement Result Data Pages

See Appendix B for SAR Test Data Plots.
See Appendix C for SAR Test Setup Photos.

Procedures Used To Establish Test Signal

The device was either placed into simulated transmit mode using the manufacturer's test codes or the actual transmission is activated through a base station simulator or similar equipment. See data pages for actual procedure used in measurement.

Device Test Condition

In order to verify that the device was tested at full power, conducted output power measurements were performed before and after each SAR measurement to confirm the output power unless otherwise noted. If a conducted power deviation of more than 5% occurred, the test was repeated. The power drift of each test is measured at the start of the test and again at the end of the test. The drift percentage is calculated by the formula $((\text{end}/\text{start}) - 1) * 100$ and rounded to three decimal places. The drift percentage is calculated into the resultant SAR value on the data sheet for each test.

The testing was conducted on the front and back of the unit with 0 mm gap. The device would only be next to the body for the front and back. Therefore, all remaining sides were not tested.

All measurements were conducted with the device on a minimum of 10 cm of Styrofoam.

The data rates used when evaluating the WiFi transmitter were the lowest data rates for each mode. The device was operating at its maximum output power at the lowest data rate for all measurements.

Conducted Power Measurements

Band	Mode	Bandwidth (MHz)	Channel	Frequency (MHz)	Data Rate	Antenna	Avg Power (dBm)	Tune-up Pwr (dBm)
2450 MHz	802.11b	20	1	2412	1 Mbps	Chain A	18.81	19.0
			6	2437			18.40	19.0
			11	2462			18.70	19.0
	802.11g	20	1	2412	6 Mbps	Chain A	15.18	18.0
			6	2437			17.35	18.0
			11	2462			15.58	18.0
	802.11n	20	1	2412	HT0	Chain A	14.82	18.0
			6	2437			17.09	18.0
			11	2462			15.25	18.0

Figure 8.1 Test Reduction Table – 2.4 GHz

Mode	Side	Required Channel	Tested/Reduced
802.11b	Back	1 – 2412 MHz	Tested
		6 – 2437 MHz	Tested
		11 – 2462 MHz	Tested
	Front	1 – 2412 MHz	Tested
		6 – 2437 MHz	Tested
		11 – 2462 MHz	Tested
802.11g	Back	1 – 2412 MHz	Reduced ³
		6 – 2437 MHz	Reduced ³
		11 – 2462 MHz	Reduced ³
	Front	1 – 2412 MHz	Reduced ³
		6 – 2437 MHz	Reduced ³
		11 – 2462 MHz	Reduced ³
802.11n	Back	1 – 2412 MHz	Reduced ³
		6 – 2437 MHz	Reduced ³
		11 – 2462 MHz	Reduced ³
	Front	1 – 2412 MHz	Reduced ³
		6 – 2437 MHz	Reduced ³
		11 – 2462 MHz	Reduced ³

Reduced¹ – When the reported SAR is ≤ 0.4 W/kg, SAR is not required for the remaining test configuration per KDB 248227 D01 v02r02 section 5.1.1 1) page 9.

Reduced² – When the reported SAR is >0.4 W/kg, test the next highest configuration until the SAR value is ≤ 0.8 W/kg per KDB 248227 D01 v02r02 section 5.1.1 2) page 9.

Reduced³ – 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 ≤ 1.2 W/kg, SAR is not required per KDB 248227 D01 v02r02 section 5.2.2 2) page 10.

SAR Data Summary – 2450 MHz Body 802.11b

MEASUREMENT RESULTS								
Plot	Gap	Position	Frequency		Modulation	End Power	Measured SAR (W/kg)	Reported SAR (W/kg)
			MHz	Ch.		(dBm)		
-----	0 mm	Back	2412	1	DSSS	18.81	0.0126	0.01
2			2437	6	DSSS	18.40	0.0131	0.02
-----			2462	11	DSSS	18.70	0.0127	0.01
-----		Front	2412	1	DSSS	18.81	0.0102	0.01
-----			2437	6	DSSS	18.40	0.0113	0.01
-----			2462	11	DSSS	18.70	0.0108	0.01
					Body 1.6 W/kg (mW/g) averaged over 1 gram			

- Battery is fully charged for all tests.
 Power Measured ☒ Conducted ☐ ERP ☐ EIRP
- SAR Measurement
 Phantom Configuration ☐ Left Head ☒ Eli4 ☐ Right Head
 SAR Configuration ☐ Head ☒ Body
- Test Signal Call Mode ☒ Test Code ☐ Base Station Simulator
- Test Configuration ☐ With Belt Clip ☐ Without Belt Clip ☒ N/A
- Tissue Depth is at least 15.0 cm



Jay M. Moulton
Vice President

9. Test Equipment List

Table 9.1 Equipment Specifications

Type	Calibration Due Date	Calibration Done Date	Serial Number
Staubli Robot TX60L	N/A	N/A	F07/55M6A1/A/01
Measurement Controller CS8c	N/A	N/A	1012
ELI4 Flat Phantom	N/A	N/A	1065
Device Holder	N/A	N/A	N/A
Data Acquisition Electronics 4	08/20/2019	08/20/2018	759
SPEAG E-Field Probe EX3DV4	06/03/2020	06/03/2019	7531
Speag Validation Dipole D2450V2	07/12/2019	07/12/2018	829
Agilent N1911A Power Meter	04/27/2020	04/27/2019	GB45100254
Agilent N1922A Power Sensor	04/27/2020	04/27/2019	MY45240464
Advantest R3261A Spectrum Analyzer	03/25/2020	03/25/2019	31720068
Agilent (HP) 8350B Signal Generator	03/20/2020	03/20/2019	2749A10226
Agilent (HP) 83525A RF Plug-In	03/20/2020	03/20/2019	2647A01172
Agilent (HP) 8753C Vector Network Analyzer	03/20/2020	03/20/2019	3135A01724
Agilent (HP) 85047A S-Parameter Test Set	03/20/2020	03/20/2019	2904A00595
Agilent (HP) 8960 Base Station Sim.	03/19/2020	03/19/2019	MY48360364
Anritsu MT8820C	01/26/2020	01/26/2019	6201176199
Agilent 778D Dual Directional Coupler	N/A	N/A	MY48220184
MiniCircuits BW-N20W5+ Fixed 20 dB Attenuator	N/A	N/A	N/A
MiniCircuits SPL-10.7+ Low Pass Filter	N/A	N/A	R8979513746
Apriel Dielectric Probe Assembly	N/A	N/A	0011
Body Equivalent Matter (2450 MHz)	N/A	N/A	N/A

10. Conclusion

The SAR measurement indicates that the EUT complies with the RF radiation exposure limits of the IC. These measurements are taken to simulate the RF effects exposure under worst-case conditions. Precise laboratory measures were taken to assure repeatability of the tests. The tested device complies with the requirements in respect to all parameters subject to the test. The test results and statements relate only to the item(s) tested.

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

11. References

- [1] Federal Communications Commission, ET Docket 93-62, Guidelines for Evaluating the Environmental Effects of Radio Frequency Radiation, August 1996
- [2] ANSI/IEEE C95.1 – 1992, American National Standard Safety Levels with respect to Human Exposure to Radio Frequency Electromagnetic Fields, 300kHz to 100GHz, New York: IEEE, 1992.
- [3] ANSI/IEEE C95.3 – 2002, IEEE Recommended Practice for the Measurement of Potentially Hazardous Electromagnetic Fields – RF and Microwave, New York: IEEE, 2002.
- [4] International Electrotechnical Commission, IEC 62209-2 (Edition 1.0), Human Exposure to radio frequency fields from hand-held and body mounted wireless communication devices – Human models, instrumentation, and procedures – Part 2: Procedure to determine the specific absorption rate (SAR) for wireless communication devices used in close proximity to the human body (frequency range of 30 MHz to 6 GHz), March 2010.
- [5] IEEE Standard 1528 – 2013, IEEE Recommended Practice for Determining the Peak-Spatial Average Specific Absorption Rate (SAR) in the Human Head from Wireless Communication Devices: Measurement Techniques, June 2013.
- [6] Industry Canada, RSS – 102 Issue 5, Radio Frequency Exposure Compliance of Radiocommunication Apparatus (All Frequency Bands), March 2015.
- [7] Health Canada, Safety Code 6, Limits of Human Exposure to Radiofrequency Electromagnetic Fields in the Frequency Range from 3kHz to 300 GHz, 2009.

Appendix A – System Verification Plots and Data

Test Result for UIM Dielectric Parameter

Thu 20/Jun/2019

Freq Frequency(GHz)

FCC_eB Limits for Body Epsilon

FCC_sB Limits for Body Sigma

Test_e Epsilon of UIM

Test_s Sigma of UIM

Freq	FCC_eB	FCC_sB	Test_e	Test_s
2.4100	52.75	1.91	52.66	1.95
2.4120	52.748	1.912	52.656	1.952*
2.4200	52.74	1.92	52.64	1.96
2.4300	52.73	1.93	52.62	1.97
2.4370	52.716	1.937	52.606	1.984*
2.4400	52.71	1.94	52.60	1.99
2.4500	52.70	1.95	52.58	2.00
2.4600	52.69	1.96	52.57	2.01
2.4620	52.686	1.964	52.566	2.012*
2.4700	52.67	1.98	52.55	2.02
2.4800	52.66	1.99	52.53	2.03

* value interpolated

RF Exposure Lab

Plot 1

DUT: Dipole 2450 MHz D2450V2; Type: D2450V2; Serial: D2450V2 - SN: 829

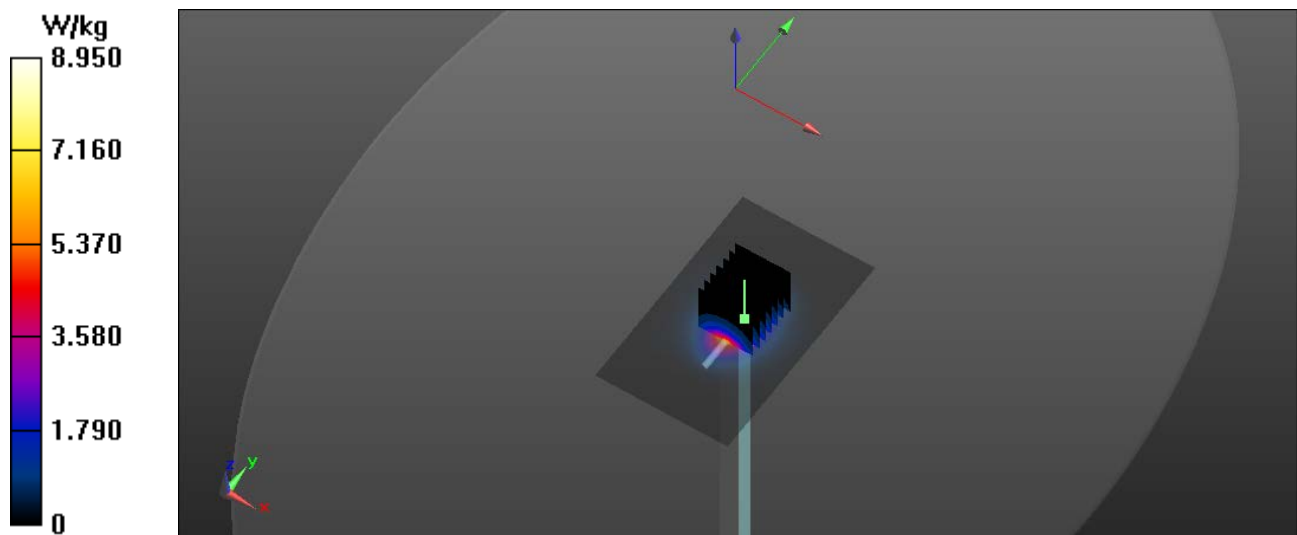
Communication System: CW; Frequency: 2450 MHz; Duty Cycle: 1:1
Medium: MSL2450; Medium parameters used: $f = 2450$ MHz; $\sigma = 2$ S/m; $\epsilon_r = 52.58$; $\rho = 1000$ kg/m³
Phantom section: Flat Section

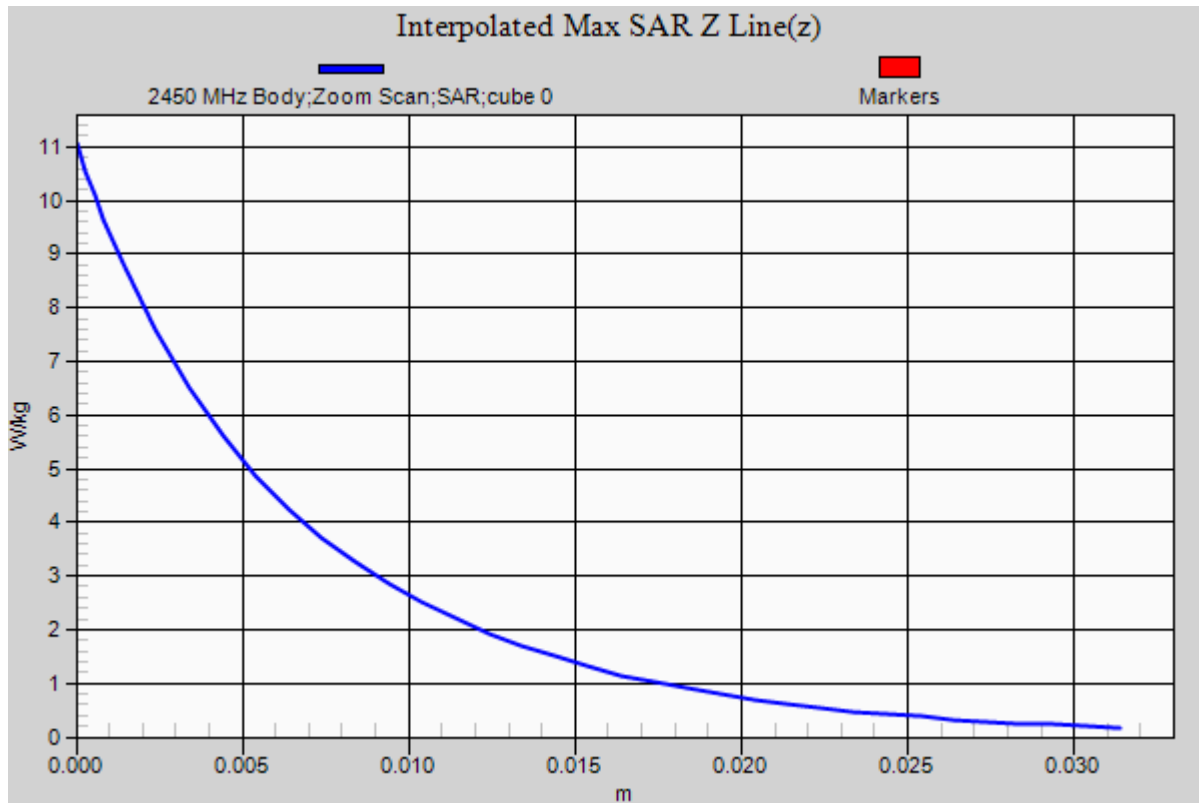
Test Date: Date: 6/20/2019; Ambient Temp: 23 °C; Tissue Temp: 21 °C
Probe: EX3DV4 – SN7531; ConvF(7.62, 7.62, 7.62); Calibrated: 6/3/2019;
Sensor-Surface: 2mm (Mechanical Surface Detection)
Electronics: DAE4 Sn759; Calibrated: 8/20/2018
Phantom: ELI v4.0; Type: QDOVA001BB; Serial: 1065
Measurement SW: DASY52, Version 52.10 (0); SEMCAD X Version 14.6.10 (7417)

Procedure Notes:

Body Verification/2450 MHz/Area Scan (61x101x1): Interpolated grid: dx=1.200 mm, dy=1.200 mm
Maximum value of SAR (interpolated) = 8.85 W/kg

Body Verification/2450 MHz/Zoom Scan (7x7x7)/Cube 0: Measurement grid: dx=5mm, dy=5mm, dz=5mm
Reference Value = 54.243 V/m; Power Drift = -0.01 dB
Peak SAR (extrapolated) = 11.1 W/kg
 $P_{in}=100$ mW
SAR(1 g) = 5.2 W/kg; SAR(10 g) = 2.41 W/kg
Maximum value of SAR (measured) = 8.93 W/kg





Appendix B – SAR Test Data Plots

RF Exposure Lab

Plot 1

DUT: AA3556; Type: Satellite Location Device; Serial: Eng 1

Communication System: WiFi 802.11b (DSSS, 1 Mbps); Frequency: 2437 MHz; Duty Cycle: 1:1
Medium: MSL2450; Medium parameters used (interpolated): $f = 2437$ MHz; $\sigma = 1.984$ S/m; $\epsilon_r = 52.606$; $\rho = 1000$ kg/m³
Phantom section: Flat Section

Test Date: Date: 6/21/2019; Ambient Temp: 23 °C; Tissue Temp: 21 °C

Probe: EX3DV4 - SN7531; ConvF(7.62, 7.62, 7.62); Calibrated: 6/3/2019;
Sensor-Surface: 3mm (Mechanical Surface Detection)
Electronics: DAE4 Sn759; Calibrated: 8/20/2018
Phantom: ELI v4.0; Type: QDOVA001BB; Serial: 1065
Measurement SW: DASY52, Version 52.10 (0); SEMCAD X Version 14.6.10 (7417)

Procedure Notes:

2450 MHz NA/Back Mid/Area Scan (8x16x1): Measurement grid: dx=12mm, dy=12mm

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

Maximum value of SAR (measured) = 0.0156 W/kg

2450 MHz NA/Back Mid/Zoom Scan (7x7x7)/Cube 0: Measurement grid: dx=5mm, dy=5mm, dz=5mm

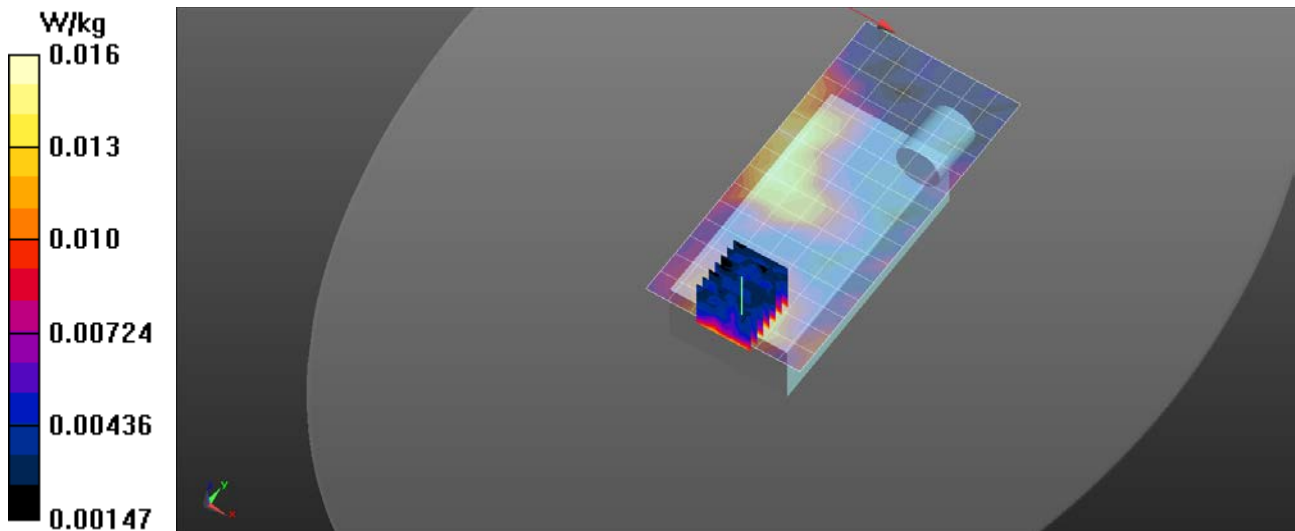
Reference Value = 3.133 V/m; Power Drift = -0.02 dB

Peak SAR (extrapolated) = 0.0270 W/kg

SAR(1 g) = 0.013 W/kg

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

Maximum value of SAR (measured) = 0.0159 W/kg



Appendix D – Probe Calibration Data Sheets



Accredited by the Swiss Accreditation Service (SAS)

The Swiss Accreditation Service is one of the signatories to the EA
Multilateral Agreement for the recognition of calibration certificates

Accreditation No.: **SCS 0108**

Client **RF Exposure Lab**

Certificate No: **EX3-7531_Jun19**

CALIBRATION CERTIFICATE

Object **EX3DV4 - SN:7531**

Calibration procedure(s) **QA CAL-01.v9, QA CAL-12.v9, QA CAL-14.v5, QA CAL-23.v5,
QA CAL-25.v7
Calibration procedure for dosimetric E-field probes**

Calibration date: **June 3, 2019**

This calibration certificate documents the traceability to national standards, which realize the physical units of measurements (SI).
The measurements and the uncertainties with confidence probability are given on the following pages and are part of the certificate.

All calibrations have been conducted in the closed laboratory facility: environment temperature (22 ± 3)°C and humidity < 70%.

Calibration Equipment used (M&TE critical for calibration)

Primary Standards	ID	Cal Date (Certificate No.)	Scheduled Calibration
Power meter NRP	SN: 104778	03-Apr-19 (No. 217-02892/02893)	Apr-20
Power sensor NRP-Z91	SN: 103244	03-Apr-19 (No. 217-02892)	Apr-20
Power sensor NRP-Z91	SN: 103245	03-Apr-19 (No. 217-02893)	Apr-20
Reference 20 dB Attenuator	SN: S5277 (20x)	04-Apr-19 (No. 217-02894)	Apr-20
DAE4	SN: 660	19-Dec-18 (No. DAE4-660_Dec18)	Dec-19
Reference Probe ES3DV2	SN: 3013	31-Dec-18 (No. ES3-3013_Dec18)	Dec-19
Secondary Standards	ID	Check Date (in house)	Scheduled Check
Power meter E4419B	SN: GB41293874	06-Apr-16 (in house check Jun-18)	In house check: Jun-20
Power sensor E4412A	SN: MY41498087	06-Apr-16 (in house check Jun-18)	In house check: Jun-20
Power sensor E4412A	SN: 000110210	06-Apr-16 (in house check Jun-18)	In house check: Jun-20
RF generator HP 8648C	SN: US3642U01700	04-Aug-99 (in house check Jun-18)	In house check: Jun-20
Network Analyzer E8358A	SN: US41080477	31-Mar-14 (in house check Oct-18)	In house check: Oct-19

Calibrated by:	Name Jeton Kastrati	Function Laboratory Technician	Signature
Approved by:	Name Katja Pokovic	Function Technical Manager	Signature

Issued: June 3, 2019

This calibration certificate shall not be reproduced except in full without written approval of the laboratory.



Accredited by the Swiss Accreditation Service (SAS)

Accreditation No.: **SCS 0108**

The Swiss Accreditation Service is one of the signatories to the EA
 Multilateral Agreement for the recognition of calibration certificates

Glossary:

TSL	tissue simulating liquid
NORM _{x,y,z}	sensitivity in free space
ConvF	sensitivity in TSL / NORM _{x,y,z}
DCP	diode compression point
CF	crest factor (1/duty_cycle) of the RF signal
A, B, C, D	modulation dependent linearization parameters
Polarization φ	φ rotation around probe axis
Polarization ϑ	ϑ rotation around an axis that is in the plane normal to probe axis (at measurement center), i.e., $\vartheta = 0$ is normal to probe axis
Connector Angle	information used in DASY system to align probe sensor X to the robot coordinate system

Calibration is Performed According to the Following Standards:

- IEEE Std 1528-2013, "IEEE Recommended Practice for Determining the Peak Spatial-Averaged Specific Absorption Rate (SAR) in the Human Head from Wireless Communications Devices: Measurement Techniques", June 2013
- IEC 62209-1, "Measurement procedure for the assessment of Specific Absorption Rate (SAR) from hand-held and body-mounted devices used next to the ear (frequency range of 300 MHz to 6 GHz)", July 2016
- IEC 62209-2, "Procedure to determine the Specific Absorption Rate (SAR) for wireless communication devices used in close proximity to the human body (frequency range of 30 MHz to 6 GHz)", March 2010
- KDB 865664, "SAR Measurement Requirements for 100 MHz to 6 GHz"

Methods Applied and Interpretation of Parameters:

- NORM_{x,y,z}**: Assessed for E-field polarization $\vartheta = 0$ ($f \leq 900$ MHz in TEM-cell; $f > 1800$ MHz: R22 waveguide). NORM_{x,y,z} are only intermediate values, i.e., the uncertainties of NORM_{x,y,z} does not affect the E²-field uncertainty inside TSL (see below ConvF).
- NORM(f)_{x,y,z}** = NORM_{x,y,z} * frequency_response (see Frequency Response Chart). This linearization is implemented in DASY4 software versions later than 4.2. The uncertainty of the frequency response is included in the stated uncertainty of ConvF.
- DCP_{x,y,z}**: DCP are numerical linearization parameters assessed based on the data of power sweep with CW signal (no uncertainty required). DCP does not depend on frequency nor media.
- PAR**: PAR is the Peak to Average Ratio that is not calibrated but determined based on the signal characteristics
- A_{x,y,z}; B_{x,y,z}; C_{x,y,z}; D_{x,y,z}; VR_{x,y,z}**: A, B, C, D are numerical linearization parameters assessed based on the data of power sweep for specific modulation signal. The parameters do not depend on frequency nor media. VR is the maximum calibration range expressed in RMS voltage across the diode.
- ConvF and Boundary Effect Parameters**: Assessed in flat phantom using E-field (or Temperature Transfer Standard for $f \leq 800$ MHz) and inside waveguide using analytical field distributions based on power measurements for $f > 800$ MHz. The same setups are used for assessment of the parameters applied for boundary compensation (alpha, depth) of which typical uncertainty values are given. These parameters are used in DASY4 software to improve probe accuracy close to the boundary. The sensitivity in TSL corresponds to NORM_{x,y,z} * ConvF whereby the uncertainty corresponds to that given for ConvF. A frequency dependent ConvF is used in DASY version 4.4 and higher which allows extending the validity from ± 50 MHz to ± 100 MHz.
- Spherical isotropy (3D deviation from isotropy)**: in a field of low gradients realized using a flat phantom exposed by a patch antenna.
- Sensor Offset**: The sensor offset corresponds to the offset of virtual measurement center from the probe tip (on probe axis). No tolerance required.
- Connector Angle**: The angle is assessed using the information gained by determining the NORM_x (no uncertainty required).

DASY/EASY - Parameters of Probe: EX3DV4 - SN:7531

Basic Calibration Parameters

	Sensor X	Sensor Y	Sensor Z	Unc (k=2)
Norm ($\mu\text{V}/(\text{V}/\text{m})^2$) ^A	0.39	0.47	0.39	$\pm 10.1 \%$
DCP (mV) ^B	97.9	95.2	100.9	

Calibration Results for Modulation Response

UID	Communication System Name		A dB	B dB $\sqrt{\mu\text{V}}$	C	D dB	VR mV	Max dev.	Unc ^E (k=2)
0	CW	X	0.0	0.0	1.0	0.00	139.8	$\pm 3.5 \%$	$\pm 4.7 \%$
		Y	0.0	0.0	1.0		132.9		
		Y	0.0	0.0	1.0		137.4		

The reported uncertainty of measurement is stated as the standard uncertainty of measurement multiplied by the coverage factor $k=2$, which for a normal distribution corresponds to a coverage probability of approximately 95%.

^A The uncertainties of Norm X,Y,Z do not affect the E^2 -field uncertainty inside TSL (see Pages 5 and 6).

^B Numerical linearization parameter: uncertainty not required.

^E Uncertainty is determined using the max. deviation from linear response applying rectangular distribution and is expressed for the square of the field value.

DASY/EASY - Parameters of Probe: EX3DV4 - SN:7531

Other Probe Parameters

Sensor Arrangement	Triangular
Connector Angle (°)	6.4
Mechanical Surface Detection Mode	enabled
Optical Surface Detection Mode	disabled
Probe Overall Length	337 mm
Probe Body Diameter	10 mm
Tip Length	9 mm
Tip Diameter	2.5 mm
Probe Tip to Sensor X Calibration Point	1 mm
Probe Tip to Sensor Y Calibration Point	1 mm
Probe Tip to Sensor Z Calibration Point	1 mm
Recommended Measurement Distance from Surface	1.4 mm

DASY/EASY - Parameters of Probe: EX3DV4 - SN:7531

Calibration Parameter Determined in Head Tissue Simulating Media

f (MHz) ^C	Relative Permittivity ^F	Conductivity (S/m) ^F	ConvF X	ConvF Y	ConvF Z	Alpha ^G	Depth ^G (mm)	Unc (k=2)
150	52.3	0.76	13.01	13.01	13.01	0.00	1.00	± 13.3 %
220	49.0	0.81	12.68	12.68	12.68	0.00	1.00	± 13.3 %
300	45.3	0.87	12.23	12.23	12.23	0.06	1.30	± 13.3 %
450	43.5	0.87	11.43	11.43	11.43	0.13	1.30	± 13.3 %
600	42.7	0.88	10.58	10.58	10.58	0.03	1.30	± 13.3 %
1450	40.5	1.20	8.85	8.85	8.85	0.38	0.80	± 12.0 %
1640	40.2	1.31	8.71	8.71	8.71	0.28	0.91	± 12.0 %
2450	39.2	1.80	7.58	7.58	7.58	0.28	0.96	± 12.0 %
5250	35.9	4.71	5.24	5.24	5.24	0.40	1.80	± 13.1 %
5600	35.5	5.07	4.69	4.69	4.69	0.40	1.80	± 13.1 %
5750	35.4	5.22	4.78	4.78	4.78	0.40	1.80	± 13.1 %

^C Frequency validity above 300 MHz of ± 100 MHz only applies for DASY v4.4 and higher (see Page 2), else it is restricted to ± 50 MHz. The uncertainty is the RSS of the ConvF uncertainty at calibration frequency and the uncertainty for the indicated frequency band. Frequency validity below 300 MHz is ± 10, 25, 40, 50 and 70 MHz for ConvF assessments at 30, 64, 128, 150 and 220 MHz respectively. Validity of ConvF assessed at 6 MHz is 4-9 MHz, and ConvF assessed at 13 MHz is 9-19 MHz. Above 5 GHz frequency validity can be extended to ± 110 MHz.

^F At frequencies below 3 GHz, the validity of tissue parameters (ϵ and σ) can be relaxed to ± 10% if liquid compensation formula is applied to measured SAR values. At frequencies above 3 GHz, the validity of tissue parameters (ϵ and σ) is restricted to ± 5%. The uncertainty is the RSS of the ConvF uncertainty for indicated target tissue parameters.

^G Alpha/Depth are determined during calibration. SPEAG warrants that the remaining deviation due to the boundary effect after compensation is always less than ± 1% for frequencies below 3 GHz and below ± 2% for frequencies between 3-6 GHz at any distance larger than half the probe tip diameter from the boundary.

DASY/EASY - Parameters of Probe: EX3DV4 - SN:7531

Calibration Parameter Determined in Body Tissue Simulating Media

f (MHz) ^C	Relative Permittivity ^F	Conductivity (S/m) ^F	ConvF X	ConvF Y	ConvF Z	Alpha ^G	Depth ^G (mm)	Unc (k=2)
150	61.9	0.80	12.57	12.57	12.57	0.00	1.00	± 13.3 %
220	60.2	0.86	12.08	12.08	12.08	0.00	1.00	± 13.3 %
300	58.2	0.92	11.64	11.64	11.64	0.03	1.20	± 13.3 %
450	56.7	0.94	11.18	11.18	11.18	0.09	1.20	± 13.3 %
600	56.1	0.95	10.55	10.55	10.55	0.08	1.20	± 13.3 %
1640	53.7	1.42	8.53	8.53	8.53	0.26	0.99	± 12.0 %
2450	52.7	1.95	7.62	7.62	7.62	0.28	0.95	± 12.0 %
5250	48.9	5.36	4.52	4.52	4.52	0.50	1.90	± 13.1 %
5600	48.5	5.77	4.01	4.01	4.01	0.50	1.90	± 13.1 %
5750	48.3	5.94	4.08	4.08	4.08	0.50	1.90	± 13.1 %

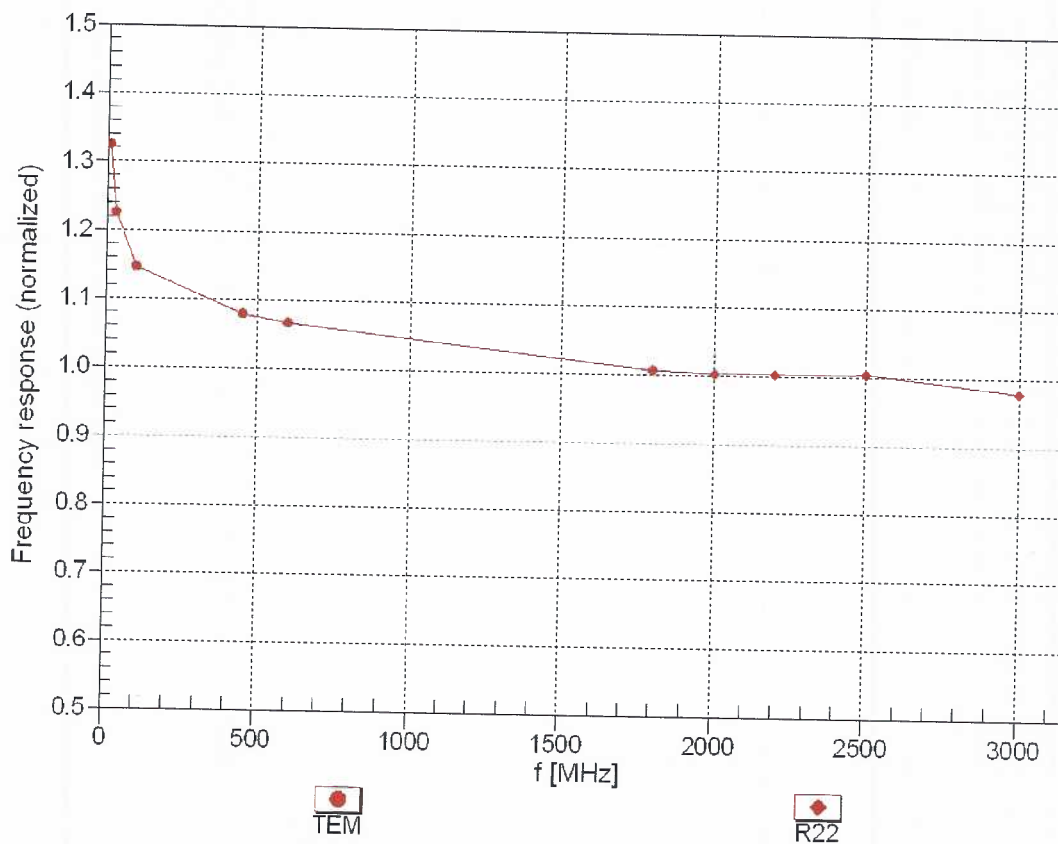
^C Frequency validity above 300 MHz of ± 100 MHz only applies for DASY v4.4 and higher (see Page 2), else it is restricted to ± 50 MHz. The uncertainty is the RSS of the ConvF uncertainty at calibration frequency and the uncertainty for the indicated frequency band. Frequency validity below 300 MHz is ± 10, 25, 40, 50 and 70 MHz for ConvF assessments at 30, 64, 128, 150 and 220 MHz respectively. Validity of ConvF assessed at 6 MHz is 4-9 MHz, and ConvF assessed at 13 MHz is 9-19 MHz. Above 5 GHz frequency validity can be extended to ± 110 MHz.

^F At frequencies below 3 GHz, the validity of tissue parameters (ϵ and σ) can be relaxed to ± 10% if liquid compensation formula is applied to measured SAR values. At frequencies above 3 GHz, the validity of tissue parameters (ϵ and σ) is restricted to ± 5%. The uncertainty is the RSS of the ConvF uncertainty for indicated target tissue parameters.

^G Alpha/Depth are determined during calibration. SPEAG warrants that the remaining deviation due to the boundary effect after compensation is always less than ± 1% for frequencies below 3 GHz and below ± 2% for frequencies between 3-6 GHz at any distance larger than half the probe tip diameter from the boundary.

Frequency Response of E-Field

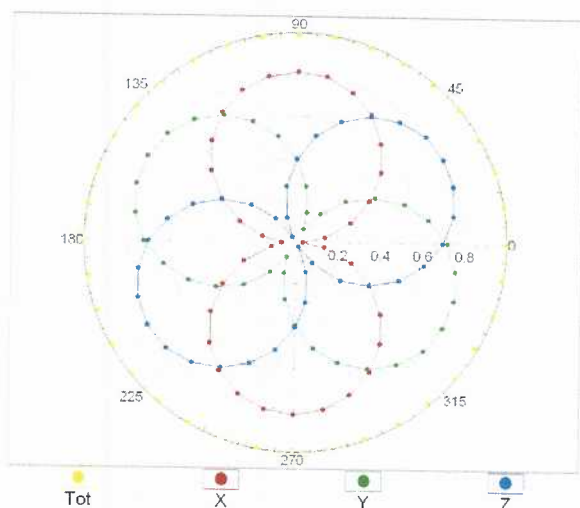
(TEM-Cell:ifi110 EXX, Waveguide: R22)



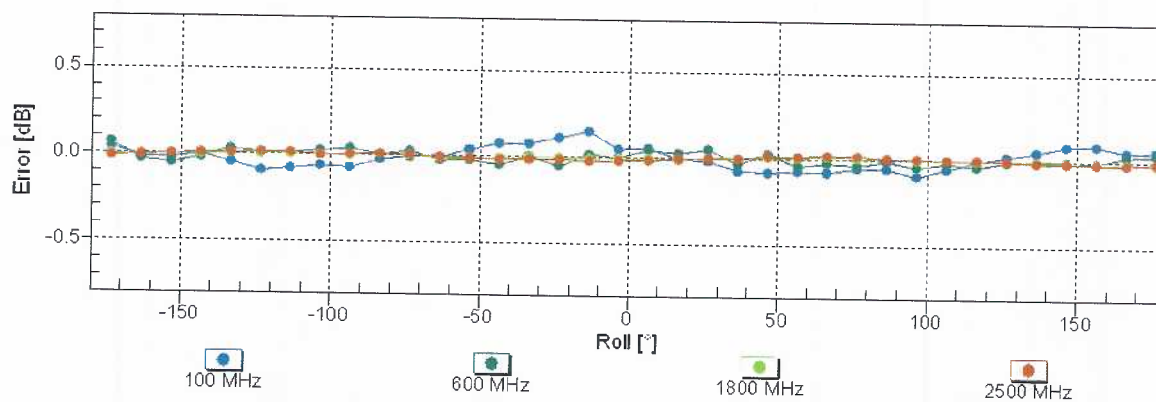
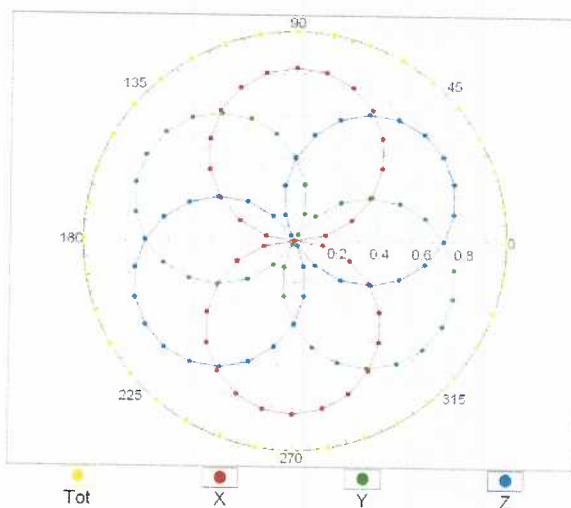
Uncertainty of Frequency Response of E-field: $\pm 6.3\%$ ($k=2$)

Receiving Pattern (ϕ), $\theta = 0^\circ$

f=600 MHz, TEM

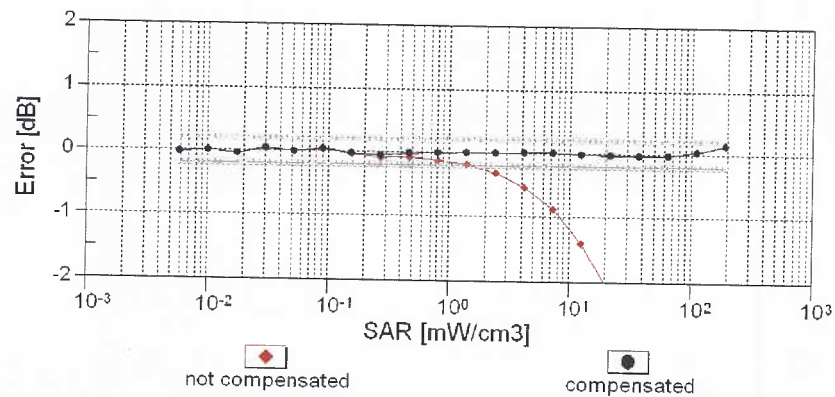
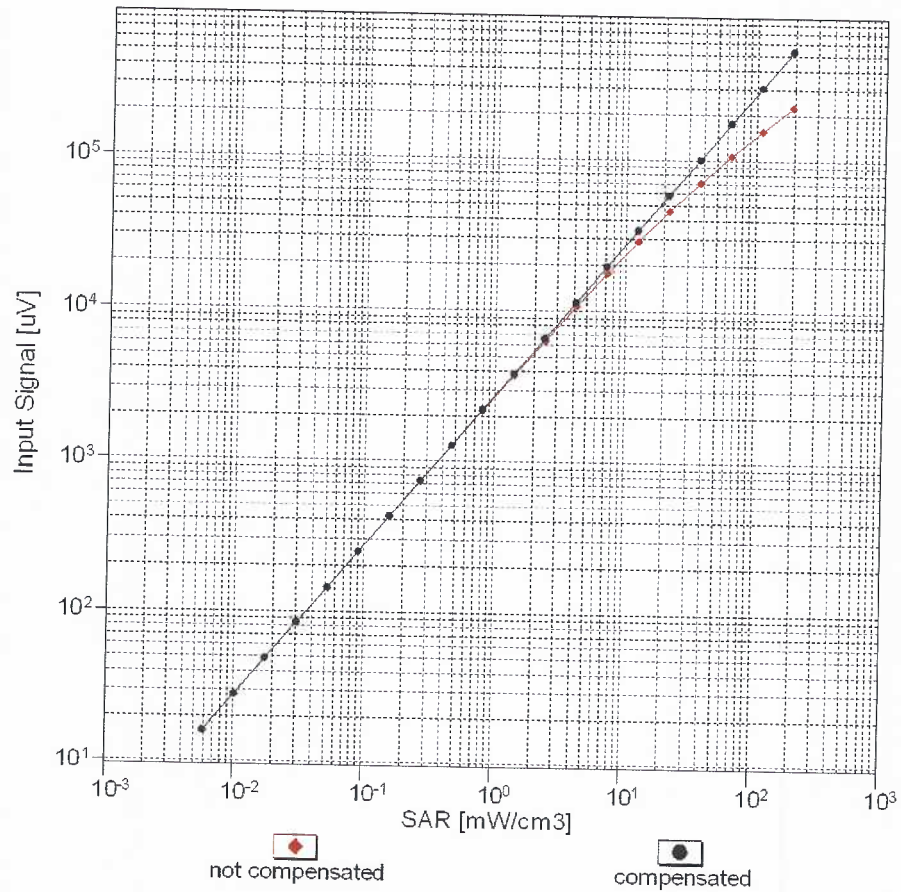


f=1800 MHz, R22



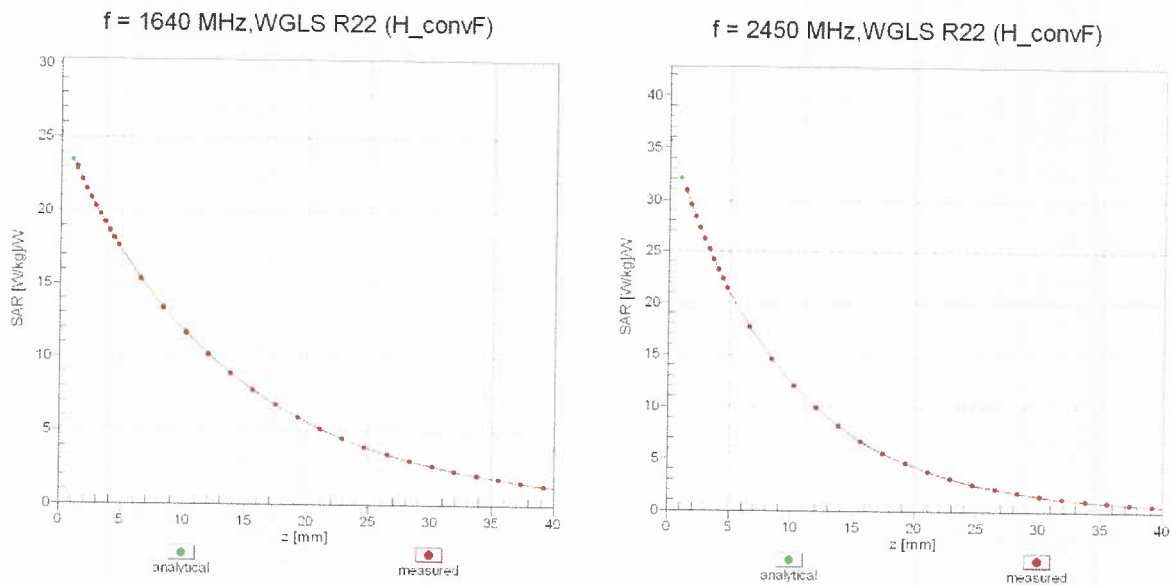
Uncertainty of Axial Isotropy Assessment: $\pm 0.5\%$ ($k=2$)

Dynamic Range $f(\text{SAR}_{\text{head}})$ (TEM cell , $f_{\text{eval}} = 1900 \text{ MHz}$)



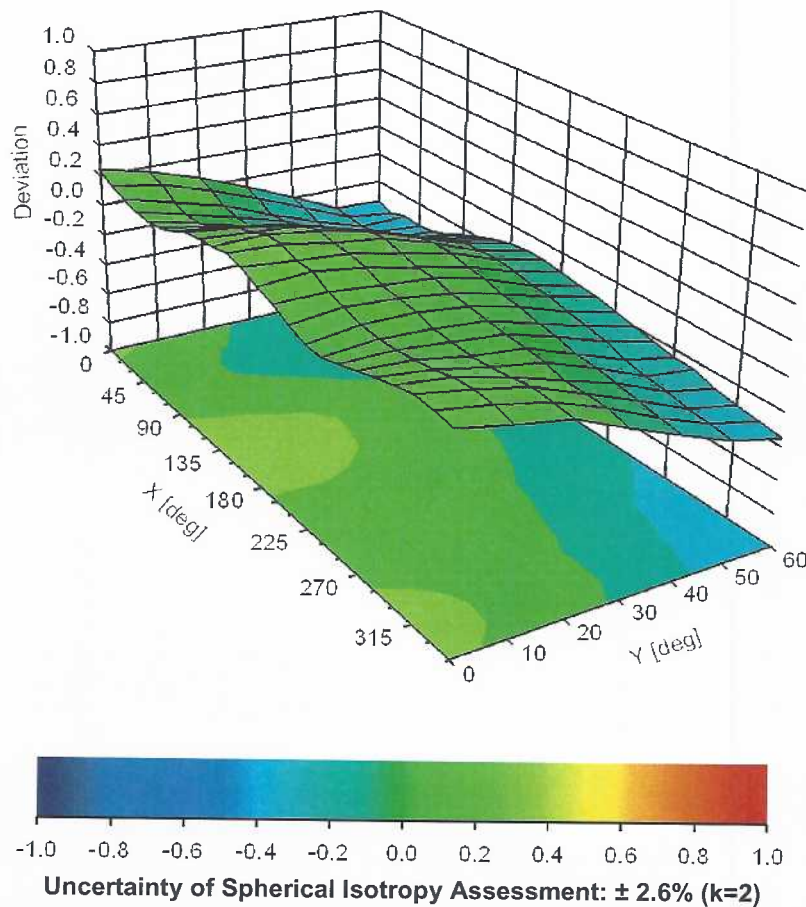
Uncertainty of Linearity Assessment: $\pm 0.6\%$ ($k=2$)

Conversion Factor Assessment



Deviation from Isotropy in Liquid

Error (ϕ, θ), $f = 900 \text{ MHz}$



Appendix E – Dipole Calibration Data Sheets



Accredited by the Swiss Accreditation Service (SAS)
 The Swiss Accreditation Service is one of the signatories to the EA
 Multilateral Agreement for the recognition of calibration certificates

Accreditation No.: **SCS 0108**

Client **RF Exposure Lab**

Certificate No: **D2450V2-829_Jul18**

CALIBRATION CERTIFICATE

Object **D2450V2 - SN:829**

Calibration procedure(s) **QA CAL-05.v10**
Calibration procedure for dipole validation kits above 700 MHz

Calibration date: **July 12, 2018**

This calibration certificate documents the traceability to national standards, which realize the physical units of measurements (SI).
 The measurements and the uncertainties with confidence probability are given on the following pages and are part of the certificate.

All calibrations have been conducted in the closed laboratory facility: environment temperature (22 ± 3)°C and humidity < 70%.

Calibration Equipment used (M&TE critical for calibration)

Primary Standards	ID #	Cal Date (Certificate No.)	Scheduled Calibration
Power meter NRP	SN: 104778	04-Apr-18 (No. 217-02672/02673)	Apr-19
Power sensor NRP-Z91	SN: 103244	04-Apr-18 (No. 217-02672)	Apr-19
Power sensor NRP-Z91	SN: 103245	04-Apr-18 (No. 217-02673)	Apr-19
Reference 20 dB Attenuator	SN: 5058 (20k)	04-Apr-18 (No. 217-02682)	Apr-19
Type-N mismatch combination	SN: 5047.2 / 06327	04-Apr-18 (No. 217-02683)	Apr-19
Reference Probe EX3DV4	SN: 7349	30-Dec-17 (No. EX3-7349_Dec17)	Dec-18
DAE4	SN: 601	26-Oct-17 (No. DAE4-601_Oct17)	Oct-18
Secondary Standards	ID #	Check Date (in house)	Scheduled Check
Power meter EPM-442A	SN: GB37480704	07-Oct-15 (in house check Oct-16)	In house check: Oct-18
Power sensor HP 8481A	SN: US37292783	07-Oct-15 (in house check Oct-16)	In house check: Oct-18
Power sensor HP 8481A	SN: MY41092317	07-Oct-15 (in house check Oct-16)	In house check: Oct-18
RF generator R&S SMT-06	SN: 100972	15-Jun-15 (in house check Oct-16)	In house check: Oct-18
Network Analyzer Agilent E8358A	SN: US41080477	31-Mar-14 (in house check Oct-17)	In house check: Oct-18

Calibrated by: **Manu Seitz** **Laboratory Technician**

Approved by: **Katja Pokovic** **Technical Manager**

Signature

Issued: July 16, 2018

This calibration certificate shall not be reproduced except in full without written approval of the laboratory.



Accredited by the Swiss Accreditation Service (SAS)

The Swiss Accreditation Service is one of the signatories to the EA
Multilateral Agreement for the recognition of calibration certificates

Accreditation No.: **SCS 0108**

Glossary:

TSL	tissue simulating liquid
ConvF	sensitivity in TSL / NORM x,y,z
N/A	not applicable or not measured

Calibration is Performed According to the Following Standards:

- IEEE Std 1528-2013, "IEEE Recommended Practice for Determining the Peak Spatial-Averaged Specific Absorption Rate (SAR) in the Human Head from Wireless Communications Devices: Measurement Techniques", June 2013
- IEC 62209-1, "Measurement procedure for the assessment of Specific Absorption Rate (SAR) from hand-held and body-mounted devices used next to the ear (frequency range of 300 MHz to 6 GHz)", July 2016
- IEC 62209-2, "Procedure to determine the Specific Absorption Rate (SAR) for wireless communication devices used in close proximity to the human body (frequency range of 30 MHz to 6 GHz)", March 2010
- KDB 865664, "SAR Measurement Requirements for 100 MHz to 6 GHz"

Additional Documentation:

- DASY4/5 System Handbook

Methods Applied and Interpretation of Parameters:

- Measurement Conditions:** Further details are available from the Validation Report at the end of the certificate. All figures stated in the certificate are valid at the frequency indicated.
- Antenna Parameters with TSL:** The dipole is mounted with the spacer to position its feed point exactly below the center marking of the flat phantom section, with the arms oriented parallel to the body axis.
- Feed Point Impedance and Return Loss:** These parameters are measured with the dipole positioned under the liquid filled phantom. The impedance stated is transformed from the measurement at the SMA connector to the feed point. The Return Loss ensures low reflected power. No uncertainty required.
- Electrical Delay:** One-way delay between the SMA connector and the antenna feed point. No uncertainty required.
- SAR measured:** SAR measured at the stated antenna input power.
- SAR normalized:** SAR as measured, normalized to an input power of 1 W at the antenna connector.
- SAR for nominal TSL parameters:** The measured TSL parameters are used to calculate the nominal SAR result.

The reported uncertainty of measurement is stated as the standard uncertainty of measurement multiplied by the coverage factor $k=2$, which for a normal distribution corresponds to a coverage probability of approximately 95%.

Measurement Conditions

DASY system configuration, as far as not given on page 1.

DASY Version	DASY5	V52.10.1
Extrapolation	Advanced Extrapolation	
Phantom	Modular Flat Phantom	
Distance Dipole Center - TSL	10 mm	with Spacer
Zoom Scan Resolution	dx, dy, dz = 5 mm	
Frequency	2450 MHz $\pm$ 1 MHz	

Head TSL parameters

The following parameters and calculations were applied.

	Temperature	Permittivity	Conductivity
Nominal Head TSL parameters	22.0 °C	39.2	1.80 mho/m
Measured Head TSL parameters	(22.0 $\pm$ 0.2) °C	37.8 $\pm$ 6 %	1.85 mho/m $\pm$ 6 %
Head TSL temperature change during test	< 0.5 °C	----	----

SAR result with Head TSL

SAR averaged over 1 cm³ (1 g) of Head TSL	Condition	
SAR measured	250 mW input power	13.2 W/kg
SAR for nominal Head TSL parameters	normalized to 1W	51.7 W/kg $\pm$ 17.0 % (k=2)

SAR averaged over 10 cm³ (10 g) of Head TSL	condition	
SAR measured	250 mW input power	6.15 W/kg
SAR for nominal Head TSL parameters	normalized to 1W	24.3 W/kg $\pm$ 16.5 % (k=2)

Body TSL parameters

The following parameters and calculations were applied.

	Temperature	Permittivity	Conductivity
Nominal Body TSL parameters	22.0 °C	52.7	1.95 mho/m
Measured Body TSL parameters	(22.0 $\pm$ 0.2) °C	51.9 $\pm$ 6 %	2.02 mho/m $\pm$ 6 %
Body TSL temperature change during test	< 0.5 °C	----	----

SAR result with Body TSL

SAR averaged over 1 cm³ (1 g) of Body TSL	Condition	
SAR measured	250 mW input power	13.0 W/kg
SAR for nominal Body TSL parameters	normalized to 1W	51.0 W/kg $\pm$ 17.0 % (k=2)

SAR averaged over 10 cm³ (10 g) of Body TSL	condition	
SAR measured	250 mW input power	6.06 W/kg
SAR for nominal Body TSL parameters	normalized to 1W	24.0 W/kg $\pm$ 16.5 % (k=2)

Appendix (Additional assessments outside the scope of SCS 0108)

Antenna Parameters with Head TSL

Impedance, transformed to feed point	$52.9 \Omega + 3.3 j\Omega$
Return Loss	- 27.4 dB

Antenna Parameters with Body TSL

Impedance, transformed to feed point	$50.9 \Omega + 5.9 j\Omega$
Return Loss	- 24.5 dB

General Antenna Parameters and Design

Electrical Delay (one direction)	1.156 ns
----------------------------------	----------

After long term use with 100W radiated power, only a slight warming of the dipole near the feedpoint can be measured.

The dipole is made of standard semirigid coaxial cable. The center conductor of the feeding line is directly connected to the second arm of the dipole. The antenna is therefore short-circuited for DC-signals. On some of the dipoles, small end caps are added to the dipole arms in order to improve matching when loaded according to the position as explained in the "Measurement Conditions" paragraph. The SAR data are not affected by this change. The overall dipole length is still according to the Standard.

No excessive force must be applied to the dipole arms, because they might bend or the soldered connections near the feedpoint may be damaged.

Additional EUT Data

Manufactured by	SPEAG
Manufactured on	December 11, 2008

DASY5 Validation Report for Head TSL

Date: 12.07.2018

Test Laboratory: SPEAG, Zurich, Switzerland

DUT: Dipole 2450 MHz; Type: D2450V2; Serial: D2450V2 - SN:829

Communication System: UID 0 - CW; Frequency: 2450 MHz

Medium parameters used: $f = 2450$ MHz; $\sigma = 1.85$ S/m; $\epsilon_r = 37.8$; $\rho = 1000$ kg/m³

Phantom section: Flat Section

Measurement Standard: DASY5 (IEEE/IEC/ANSI C63.19-2011)

DASY52 Configuration:

- Probe: EX3DV4 - SN7349; ConvF(7.88, 7.88, 7.88) @ 2450 MHz; Calibrated: 30.12.2017
- Sensor-Surface: 1.4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn601; Calibrated: 26.10.2017
- Phantom: Flat Phantom 5.0 (front); Type: QD 000 P50 AA; Serial: 1001
- DASY52 52.10.1(1476); SEMCAD X 14.6.11(7439)

Dipole Calibration for Head Tissue/Pin=250 mW, d=10mm/Zoom Scan (7x7x7)/Cube 0:

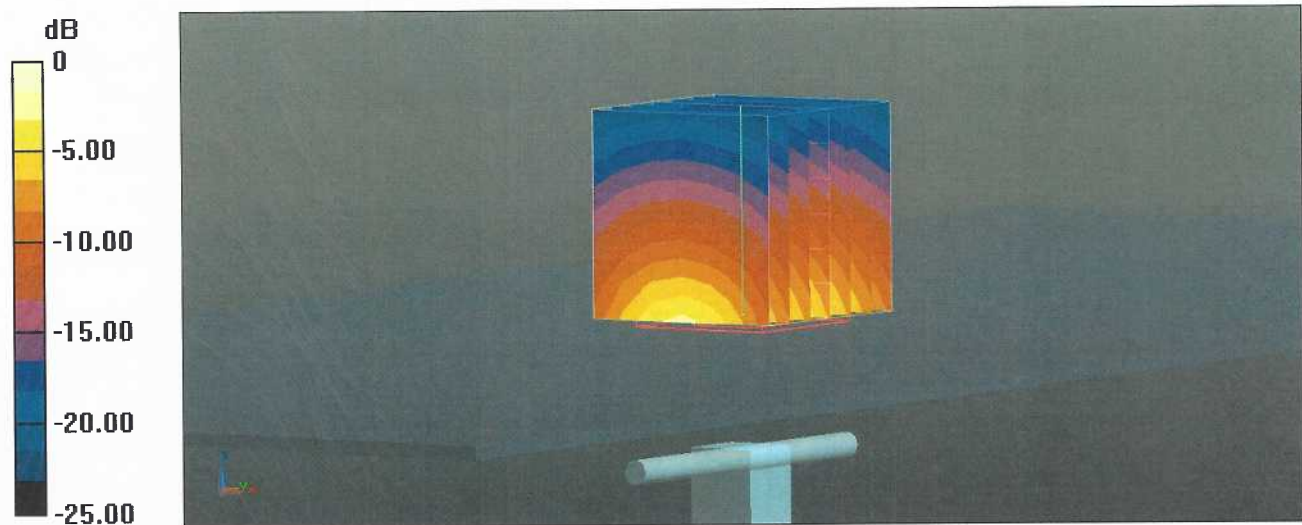
Measurement grid: dx=5mm, dy=5mm, dz=5mm

Reference Value = 116.7 V/m; Power Drift = -0.07 dB

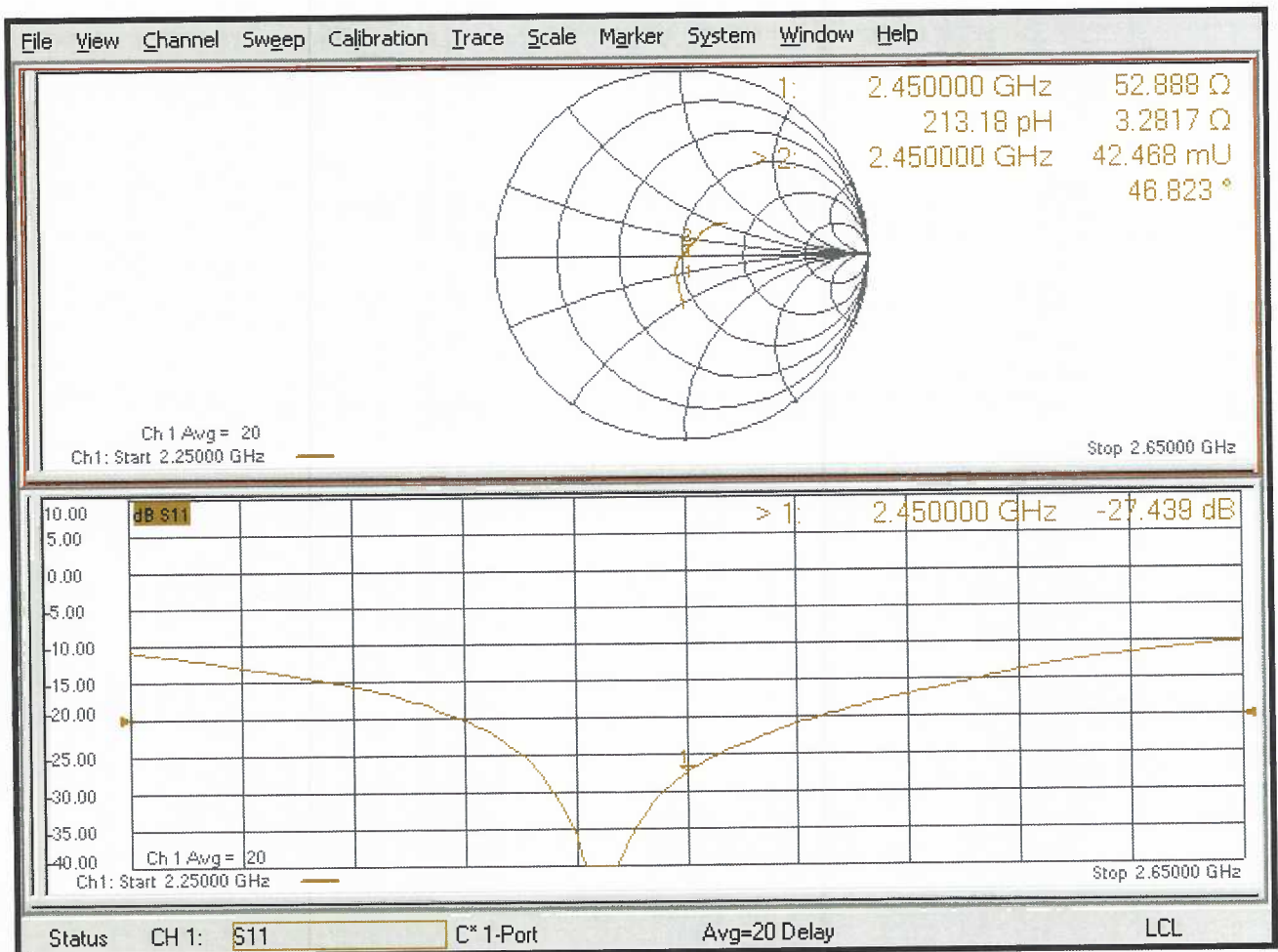
Peak SAR (extrapolated) = 26.4 W/kg

SAR(1 g) = 13.2 W/kg; SAR(10 g) = 6.15 W/kg

Maximum value of SAR (measured) = 21.9 W/kg



Impedance Measurement Plot for Head TSL



DASY5 Validation Report for Body TSL

Date: 12.07.2018

Test Laboratory: SPEAG, Zurich, Switzerland

DUT: Dipole 2450 MHz; Type: D2450V2; Serial: D2450V2 - SN:829

Communication System: UID 0 - CW; Frequency: 2450 MHz

Medium parameters used: $f = 2450$ MHz; $\sigma = 2.02$ S/m; $\epsilon_r = 51.9$; $\rho = 1000$ kg/m³

Phantom section: Flat Section

Measurement Standard: DASY5 (IEEE/IEC/ANSI C63.19-2011)

DASY52 Configuration:

- Probe: EX3DV4 - SN7349; ConvF(8.01, 8.01, 8.01) @ 2450 MHz; Calibrated: 30.12.2017
- Sensor-Surface: 1.4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn601; Calibrated: 26.10.2017
- Phantom: Flat Phantom 5.0 (back); Type: QD 000 P50 AA; Serial: 1002
- DASY52 52.10.1(1476); SEMCAD X 14.6.11(7439)

Dipole Calibration for Body Tissue/Pin=250 mW, d=10mm/Zoom Scan (7x7x7)/Cube 0:

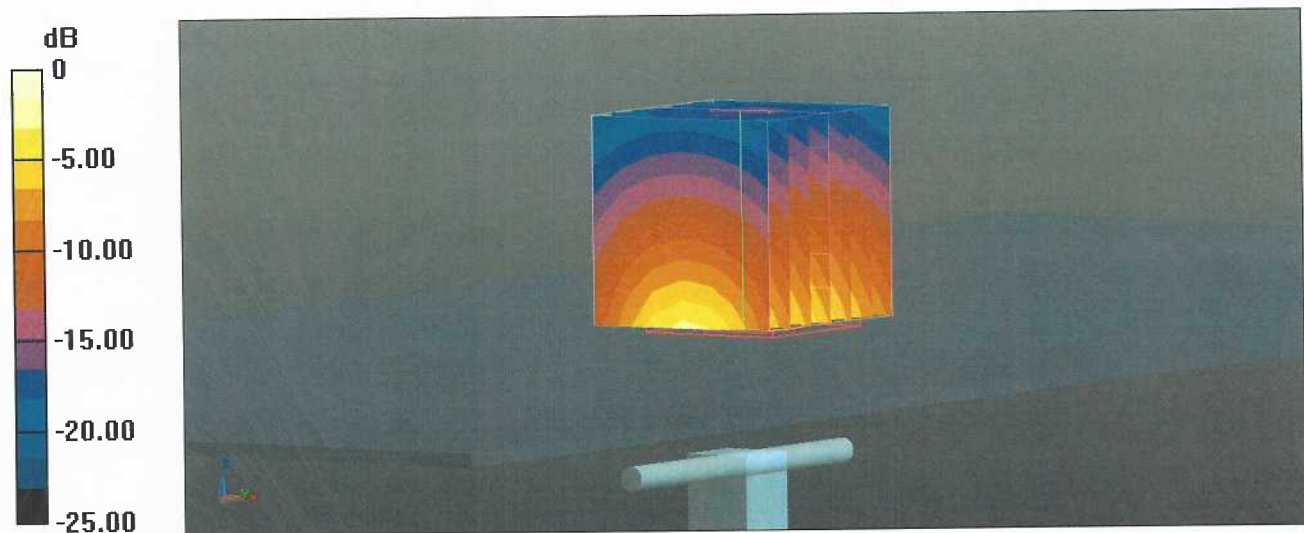
Measurement grid: dx=5mm, dy=5mm, dz=5mm

Reference Value = 107.9 V/m; Power Drift = -0.09 dB

Peak SAR (extrapolated) = 25.6 W/kg

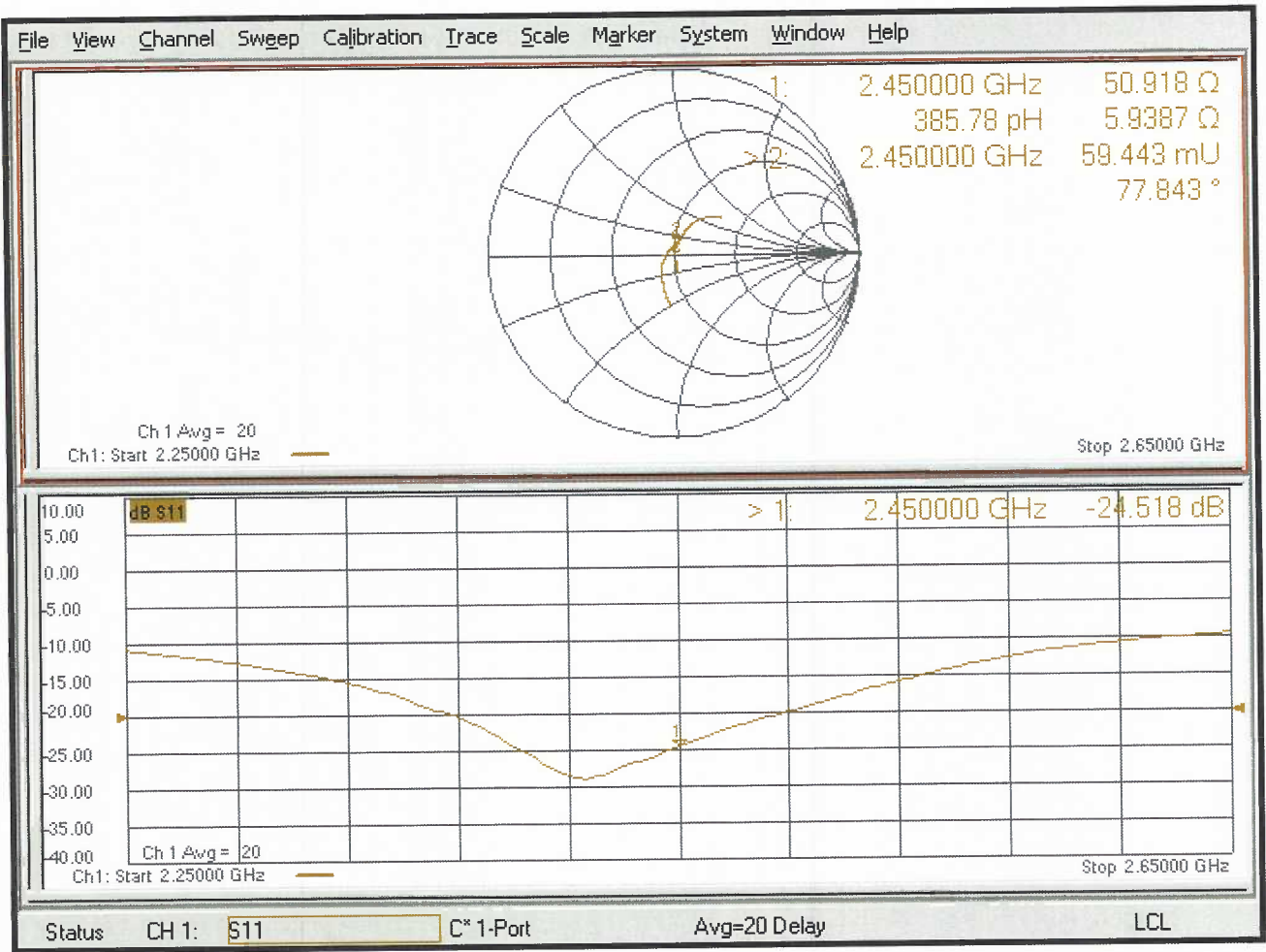
SAR(1 g) = 13 W/kg; SAR(10 g) = 6.06 W/kg

Maximum value of SAR (measured) = 21.1 W/kg



0 dB = 21.1 W/kg = 13.24 dBW/kg

Impedance Measurement Plot for Body TSL



Appendix F – Phantom Calibration Data Sheets

Certificate of Conformity / First Article Inspection

Item	Oval Flat Phantom ELI 4.0
Type No	QD OVA 001 B
Series No	1003 and higher
Manufacturer	Untersee Composites Knebelstrasse 8 CH-8268 Mannenbach, Switzerland

Tests

Complete tests were made on the prototype units QD OVA 001 AA 1001, QD OVA 001 AB 1002, pre-series units QD OVA 001 BA 1003-1005 as well as on the series units QD OVA 001 BB, 1006 ff.

Test	Requirement	Details	Units tested
Material thickness	Compliant with the standard requirements	Bottom plate: 2.0mm +/- 0.2mm	all
Material parameters	Dielectric parameters for required frequencies	< 6 GHz: Rel. permittivity = 4 +/-1, Loss tangent ≤ 0.05	Material sample
Material resistivity	The material has been tested to be compatible with the liquids defined in the standards if handled and cleaned according to the instructions.	DGBE based simulating liquids. Observe Technical Note for material compatibility.	Equivalent phantoms, Material sample
Shape	Thickness of bottom material, Internal dimensions, Sagging compatible with standards from minimum frequency	Bottom elliptical 600 x 400 mm Depth 190 mm, Shape is within tolerance for filling height up to 155 mm, Eventual sagging is reduced or eliminated by support via DUT	Prototypes, Sample testing

Standards

- [1] CENELEC EN 50361-2001, « Basic standard for the measurement of the Specific Absorption Rate related to human exposure to electromagnetic fields from mobile phones (300 MHz – 3 GHz) », July 2001
- [2] IEEE 1528-2003, "Recommended Practice for Determining the Peak Spatial-Average Specific Absorption Rate (SAR) in the Human Head from Wireless Communications Devices: Measurement Techniques, December 2003
- [3] IEC 62209 – 1, "Specific Absorption Rate (SAR) in the frequency range of 300 MHz to 3 GHz – Measurement Procedure, Part 1: Hand-held mobile wireless communication devices", February 2005
- [4] IEC 62209 – 2, Draft, "Human Exposure to Radio Frequency Fields from Handheld and Body-Mounted Wireless Communication Devices – Human models, Instrumentation and Procedures – Part 2: Procedure to determine the Specific Absorption Rate (SAR) in the head and body for 30 MHz to 6 GHz Handheld and Body-Mounted Devices used in close proximity to the Body.", February 2005
- [5] OET Bulletin 65, Supplement C, "Evaluating Compliance with FCC Guidelines for Human Exposure to Radiofrequency Electromagnetic Fields", Edition January 2001

Based on the tests above, we certify that this item is in compliance with the standards [1] to [5] if operated according to the specific requirements and considering the thickness. The dimensions are fully compliant with [4] from 30 MHz to 6 GHz. For the other standards, the minimum lower frequency limit is limited due to the dimensional requirements ([1]: 450 MHz, [2]: 300 MHz, [3]: 800 MHz, [5]: 375 MHz) and possibly further by the dimensions of the DUT.

s p e a g

Date 28.4.2008

Signature / Stamp

Schmid & Partner Engineering AG
 Zeughausstrasse 43, 8004 Zurich, Switzerland
 Phone +41 44 245 9700, Fax +41 44 245 9779
 info@speag.com, http://www.speag.com

Appendix G – Validation Summary

Per FCC KDB 865664 D02 v01r02, SAR system validation status should be documented to confirm measurement accuracy. The SAR systems (including SAR probes, system components and software versions) used for this device were validated against its performance specifications prior to the SAR measurements. Reference dipoles were used with the required tissue equivalent media for system validation according to the procedures outlined in FCC KDB 865664 D01 v01r04 and IEEE 1528-2013. Since SAR probe calibrations are frequency dependent, each probe calibration point was validated at a frequency within the valid frequency range of the probe calibration point using the system that normally operates with the probe for routine SAR measurements and according to the required tissue equivalent media.

A tabulated summary of the system validation status including the validation date(s), measurement frequencies, SAR probes and tissue dielectric parameters has been included.

Table G-1
SAR System Validation Summary

SAR System #	Freq. (MHz)	Date	Probe S/N	Probe Type	Probe Cal. Point		Cond. (σ)	Perm. (ε _r)	CW Validation			Modulation Validation		
									Sens-itivity	Probe Linearity	Probe Isotropy	Modulation Type	Duty Factor	PAR
2	2450	6/19/2019	7531	EX3DV4	2450	Body	1.96	52.64	Pass	Pass	Pass	OFDM/TDD	Pass	Pass

RF Exposure Lab

802 N. Twin Oaks Valley Road, Suite 105 • San Marcos, CA 92069 • U.S.A.

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<http://www.rfexposurelab.com>

CERTIFICATE OF COMPLIANCE SAR EVALUATION

Garmin International, Inc.
1200 E. 151st Street
Olathe, KS 66062

Dates of Test:
Test Report Number:

June 21, 2019
SAR.20190617
Revision C

FCC ID:	IPH-A3556
IC Certificate:	1792A-A3556
Model(s):	AA3556
Test Sample:	Engineering Unit Same as Production
Serial Number:	Eng 1
Equipment Type:	Wireless GPS Location Device
Classification:	Portable Transmitter Next to Body
TX Frequency Range:	2412 – 2462 MHz
Frequency Tolerance:	± 2.5 ppm
Maximum RF Output:	2450 MHz (b) – 19.0 dBm, 2450 MHz (g) – 18.0 dBm, 2450 MHz (n20) – 18.0 dBm
Signal Modulation:	Conducted
Antenna Type:	DSSS, OFDM
Application Type:	Internal
FCC Rule Parts:	Certification
KDB Test Methodology:	Part 2, 15C, 15E
Industry Canada:	KDB 447498 D01 v06, KDB 248227 v02r02
Maximum SAR Value:	RSS-102 Issue 5, Safety Code 6
Separation Distance:	0.02 W/kg Reported
	0 mm

This wireless mobile and/or portable device has been shown to be compliant for localized specific absorption rate (SAR) for uncontrolled environment/general exposure limits specified in ANSI/IEEE Std. C95.1-1992 and had been tested in accordance with the measurement procedures specified in IEEE 1528-2013 and IEC 62209-2:2010 (See test report).

I attest to the accuracy of the data. All measurements were performed by myself or were made under my supervision and are correct to the best of my knowledge and belief. I assume full responsibility for the completeness of these measurements and vouch for the qualifications of all persons taking them.

RF Exposure Lab, LLC certifies that no party to this application is subject to a denial of Federal benefits that includes FCC benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. 853(a).



Jay M. Moulton
Vice President



Testing Cert. # 2387.01

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Comment/Revision	Date
Original Release	June 24, 2019
Revision A – Correct Test Setup Photos	August 19, 2019
Revision B – Add Carabiner Data	August 29, 2019
Revision C – Correct Verification Date in table on page 19	December 27, 2019

1. Introduction

This measurement report shows compliance of the Garmin International, Inc. Model AA3556 FCC ID: IPH-A3556 with FCC Part 2, 1093, ET Docket 93-62 Rules and IC Certificate: 1792A-A3556 with RSS102 Issue 5 & Safety Code 6 for mobile and portable devices. The FCC has adopted the guidelines for evaluating the environmental effects of radio frequency radiation in ET Docket 93-62 on August 6, 1996 to protect the public and workers from the potential hazards of RF emissions due to FCC regulated portable devices. [1], [6]

The test results recorded herein are based on a single type test of Garmin International, Inc. Model AA3556 and therefore apply only to the tested sample.

The test procedures, as described in ANSI C95.1 – 1999 Standard for Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 kHz to 300 GHz [2], ANSI C95.3 – 2002 Recommended Practice for the Measurement of Potentially Hazardous Electromagnetic Fields [3], IEEE Std.1528 – 2013 Recommended Practice [5], and Industry Canada Safety Code 6 Limits of Human Exposure to Radiofrequency Electromagnetic Fields in the Frequency Range from 3kHz to 300 GHz were employed.

The following table indicates all the wireless technologies operating in the AA3556 Wireless GPS Location Device. The table also shows the tolerance for the power level for each mode.

Band	Modulation	Calibrated Nominal Power dBm	Tolerance dBm	Lower Tolerance dBm	Upper Tolerance dBm
2450 MHz	802.11b	N/A	N/A	N/A	19.0
2450 MHz	802.11gn20	N/A	N/A	N/A	18.0

SAR Definition [5]

Specific Absorption Rate is defined as the time derivative (rate) of the incremental energy (dW) absorbed by (dissipated in) an incremental mass (dm) contained in a volume element (dV) of a given density (ρ).

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

SAR is expressed in units of watts per kilogram (W/kg). SAR can be related to the electric field at a point by

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

where:

σ = conductivity of the tissue (S/m)

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

E = rms electric field strength (V/m)

2. SAR Measurement Setup

Robotic System

These measurements are performed using the DASY52 automated dosimetric assessment system. The DASY52 is made by Schmid & Partner Engineering AG (SPEAG) in Zurich, Switzerland and consists of high precision robotics system (Staubli), robot controller, Intel Core2 computer, near-field probe, probe alignment sensor, and the generic twin phantom containing the brain equivalent material. The robot is a six-axis industrial robot performing precise movements to position the probe to the location (points) of maximum electromagnetic field (EMF) (see Fig. 2.1).

System Hardware

A cell controller system contains the power supply, robot controller teach pendant (Joystick), and a remote control used to drive the robot motors. The PC consists of the HP Intel Core2 computer with Windows XP system and SAR Measurement Software DASY52, A/D interface card, monitor, mouse, and keyboard. The Staubli Robot is connected to the cell controller to allow software manipulation of the robot. A data acquisition electronic (DAE) circuit that 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 into digital electric signal of the DAE and transfers data to the PC plug-in card.

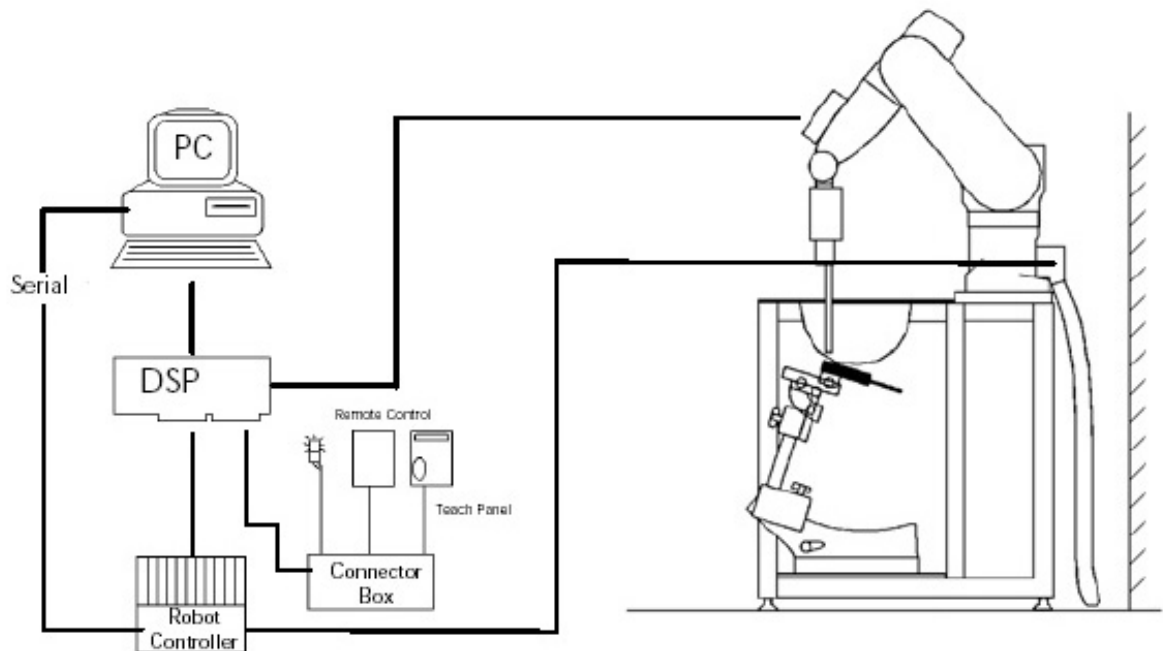


Figure 2.1 SAR Measurement System Setup

System Electronics

The DAE4 consists of a highly sensitive electrometer-grade preamplifier with auto-zeroing, a channel and gain-switching multiplexer, a fast 16 bit AD-converter and a command decoder and control logic unit. Transmission to the PC-card 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. They are also used for mechanical surface detection and probe collision detection. The robot uses its own controller with a built in VME-bus computer. The system is described in detail in.

Probe Measurement System

The SAR measurements were conducted with the dosimetric probe EX3DV4, designed in the classical triangular configuration (see Fig. 2.2) and optimized for dosimetric evaluation. The probe is constructed using the thick film technique; with printed resistive lines on ceramic substrates. The probe is equipped with an optical multi fiber line ending at the front of the probe tip. (see Fig. 2.3) It is connected to the EOC box on the robot arm and provides an automatic detection of the phantom surface. Half of the fibers are connected to a pulsed infrared transmitter, the other half to a synchronized receiver. As the probe approaches the surface, the reflection from the surface produces a coupling from the transmitting to the receiving fibers. This reflection increases first during the approach, reaches maximum and then decreases. If the probe is flatly touching the surface, the coupling is zero. The distance of the coupling maximum to the surface is independent of the surface reflectivity and largely independent of the surface to probe angle. The DASY52 software reads the reflection during a software approach and looks for the maximum using a 2nd order fitting. The approach is stopped at reaching the maximum.



DAE System

Probe Specifications

Calibration: In air from 10 MHz to 6.0 GHz
In brain and muscle simulating tissue at Frequencies of 450 MHz, 835 MHz, 1750 MHz, 1900 MHz, 2450 MHz, 2600 MHz, 3500 MHz, 5200 MHz, 5300 MHz, 5600 MHz, 5800 MHz

Frequency: 10 MHz to 6 GHz

Linearity: $\pm 0.2\text{dB}$ (30 MHz to 6 GHz)

Dynamic: 10 mW/kg to 100 W/kg

Range: Linearity: $\pm 0.2\text{dB}$

Dimensions: Overall length: 330 mm

Tip length: 20 mm

Body diameter: 12 mm

Tip diameter: 2.5 mm

Distance from probe tip to sensor center: 1 mm

Application: SAR Dosimetry Testing
Compliance tests of wireless device

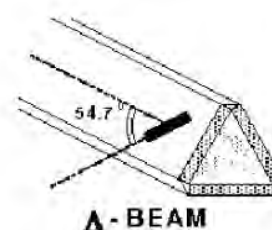


Figure 2.2 Triangular Probe Configurations



Figure 2.3 Probe Thick-Film Technique

Probe Calibration Process

Dosimetric Assessment Procedure

Each probe is calibrated according to a dosimetric assessment procedure described in with accuracy better than +/- 10%. The spherical isotropy was evaluated with the procedure described in and found to be better than +/-0.25dB. The sensitivity parameters (Norm X, Norm Y, Norm Z), the diode compression parameter (DCP) and the conversion factor (Conv F) of the probe is tested.

Free Space Assessment

The free space E-field from amplified probe outputs is determined in a test chamber. This is performed in a TEM cell for frequencies below 1 GHz, and in a waveguide above 1GHz for free space. For the free space calibration, the probe is placed in the volumetric center of the cavity at the proper orientation with the field. The probe is then rotated 360 degrees until the three channels show the maximum reading. The power density readings equates to 1 mW/cm².

Temperature Assessment *

E-field temperature correlation calibration is performed in a flat phantom filled with the appropriate simulated brain tissue. The measured free space E-field in the medium, correlates to temperature rise in a dielectric medium. For temperature correlation calibration a RF transparent thermistor based temperature probe is used in conjunction with the E-field probe

$$SAR = C \frac{\Delta T}{\Delta t}$$

where:

Δt = exposure time (30 seconds),

C = heat capacity of tissue (brain or muscle),

ΔT = temperature increase due to RF exposure.

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

where:

σ = simulated tissue conductivity,

ρ = Tissue density (1.25 g/cm³ for brain tissue)

SAR is proportional to $\Delta T / \Delta t$, the initial rate of tissue heating, before thermal diffusion takes place.

Now it's possible to quantify the electric field in the simulated tissue by equating the thermally derived SAR to the E- field;

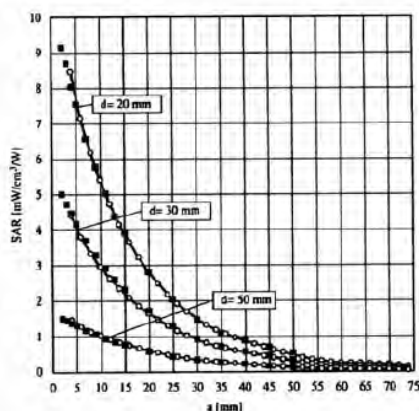


Figure 2.4 E-Field and Temperature Measurements at 900MHz

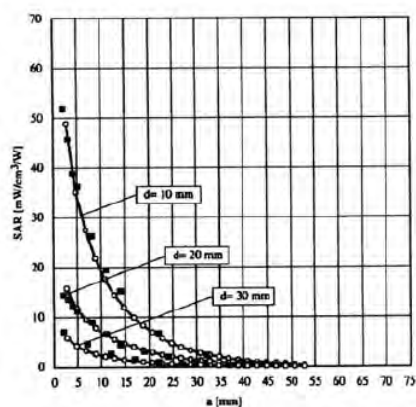


Figure 2.5 E-Field and Temperature Measurements at 1800MHz

Data Extrapolation

The DASY52 software automatically executes the following procedures to calculate the field units from the microvolt readings at the probe connector. The first step of the evaluation is a linearization of the filtered input signal to account for the compression characteristics of the detector diode. The compensation depends on the input signal, the diode type and the DC-transmission factor from the diode to the evaluation electronics. If the exciting field is pulsed, the crest factor of the signal must be known to correctly compensate for peak power. The formula for each channel can be given like below;

$$V_i = U_i + U_i^2 \cdot \frac{cf}{dcp_i}$$

with V_i = compensated signal of channel i (i=x,y,z)
 U_i = input signal of channel i (i=x,y,z)
 cf = crest factor of exciting field (DASY parameter)
 dcp_i = diode compression point (DASY parameter)

From the compensated input signals the primary field data for each channel can be evaluated:

E-field probes:

$$E_i = \sqrt{\frac{V_i}{Norm_i \cdot ConvF}}$$

with V_i = compensated signal of channel i (i = x,y,z)
 $Norm_i$ = sensor sensitivity of channel i (i = x,y,z)
 $\mu V/(V/m)^2$ for E-field probes
 $ConvF$ = sensitivity of enhancement in solution
 E_i = electric field strength of channel i in V/m

The RSS value of the field components gives the total field strength (Hermetian magnitude):

$$E_{tot} = \sqrt{E_x^2 + E_y^2 + E_z^2}$$

The primary field data are used to calculate the derived field units.

$$SAR = E_{tot}^2 \cdot \frac{\sigma}{\rho \cdot 1000}$$

with SAR = local specific absorption rate in W/g
 E_{tot} = total field strength in V/m
 σ = conductivity in [mho/m] or [Siemens/m]
 ρ = equivalent tissue density in g/cm³

The power flow density is calculated assuming the excitation field to be a free space field.

$$P_{free} = \frac{E_{tot}^2}{3770}$$

with P_{pwe} = equivalent power density of a plane wave in W/cm²
 E_{tot} = total electric field strength in V/m

Scanning procedure

- The DASY installation includes predefined files with recommended procedures for measurements and system check. They are read-only document files and destined as fully defined but unmeasured masks. All test positions (head or body-worn) are tested with the same configuration of test steps differing only in the grid definition for the different test positions.
- The „reference“ and „drift“ measurements are located at the beginning and end of the batch process. They measure the field drift at one single point in the liquid over the complete procedure. The indicated drift is mainly the variation of the DUT's output power and should vary max. +/- 5 %.
- The highest integrated SAR value is the main concern in compliance test applications. These values can mostly be found at the inner surface of the phantom and cannot be measured directly due to the sensor offset in the probe. To extrapolate the surface values, the measurement distances to the surface must be known accurately. A distance error of 0.5mm could produce SAR errors of 6% at 1800 MHz. Using predefined locations for measurements is not accurate enough. Any shift of the phantom (e.g., slight deformations after filling it with liquid) would produce high uncertainties. For an automatic and accurate detection of the phantom surface, the DASY5 system uses the mechanical surface detection. The detection is always at touch, but the probe will move backward from the surface the indicated distance before starting the measurement.
- The „area scan“ measures the SAR above the DUT or verification dipole on a parallel plane to the surface. It is used to locate the approximate location of the peak SAR with 2D spline interpolation. The robot performs a stepped movement along one grid axis while the local electrical field strength is measured by the probe. The probe is touching the surface of the SAM during acquisition of measurement values. The scan uses different grid spacings for different frequency measurements. Standard grid spacing for head measurements in frequency ranges ≤ 2 GHz is 15 mm in x - and y-dimension. For higher frequencies a finer resolution is needed, thus for the grid spacing is reduced according the following table:

Area scan grid spacing for different frequency ranges	
Frequency range	Grid spacing
≤ 2 GHz	≤ 15 mm
2 – 4 GHz	≤ 12 mm
4 – 6 GHz	≤ 10 mm

Grid spacing and orientation have no influence on the SAR result. For special applications where the standard scan method does not find the peak SAR within the grid, e.g. mobile phones with flip cover, the grid can be adapted in orientation. Results of this coarse scan are shown in annex B.

- A „zoom scan” measures the field in a volume around the 2D peak SAR value acquired in the previous „coarse” scan. It uses a fine meshed grid where the robot moves the probe in steps along all the 3 axis (x,y and z-axis) starting at the bottom of the Phantom. The grid spacing for the cube measurement is varied according to the measured frequency range, the dimensions are given in the following table:

Zoom scan grid spacing and volume for different frequency ranges			
Frequency range	Grid spacing for x, y axis	Grid spacing for z axis	Minimum zoom scan volume
≤ 2 GHz	≤ 8 mm	≤ 5 mm	≥ 30 mm
2 – 3 GHz	≤ 5 mm	≤ 5 mm	≥ 28 mm
3 – 4 GHz	≤ 5 mm	≤ 4 mm	≥ 28 mm
4 – 5 GHz	≤ 4 mm	≤ 3 mm	≥ 25 mm
5 – 6 GHz	≤ 4 mm	≤ 2 mm	≥ 22 mm

DASY is also able to perform repeated zoom scans if more than 1 peak is found during area scan. In this document, the evaluated peak 1g and 10g averaged SAR values are shown in the 2D-graphics in annex B. Test results relevant for the specified standard (see section 3) are shown in table form in section 7.

Spatial Peak SAR Evaluation

The spatial peak SAR - value for 1 and 10 g is evaluated after the Cube measurements have been done. The basis of the evaluation are the SAR values measured at the points of the fine cube grid consisting of all points in the three directions x, y and z. The algorithm that finds the maximal averaged volume is separated into three different stages.

- The data between the dipole center of the probe and the surface of the phantom are extrapolated. This data cannot be measured since the center of the dipole is 1 to 2.7 mm away from the tip of the probe and the distance between the surface and the lowest measuring point is about 1 mm (see probe calibration sheet). The extrapolated data from a cube measurement can be visualized by selecting 'Graph Evaluated'.
- The maximum interpolated value is searched with a straight-forward algorithm. Around this maximum the SAR - values averaged over the spatial volumes (1g or 10 g) are computed using the 3d-spline interpolation algorithm. If the volume cannot be evaluated (i.e., if a part of the grid was cut off by the boundary of the measurement area) the evaluation will be started on the corners of the bottom plane of the cube.
- All neighbouring volumes are evaluated until no neighbouring volume with a higher average value is found.

Extrapolation

The extrapolation is based on a least square algorithm [W. Gander, Computermathematik, p.168-180]. Through the points in the first 3 cm along the z-axis, polynomials of order four are calculated. These polynomials are then used to evaluate the points between the surface and the probe tip. The points, calculated from the surface, have a distance of 1 mm from each other.

Interpolation

The interpolation of the points is done with a 3d-Spline. The 3d-Spline is composed of three one-dimensional splines with the "Not a knot"-condition [W. Gander, Computermathematik, p.141-150] (x, y and z -direction) [Numerical Recipes in C, Second Edition, p.123ff].

Volume Averaging

At First the size of the cube is calculated. Then the volume is integrated with the trapezoidal algorithm. 8000 points (20x20x20) are interpolated to calculate the average.

Advanced Extrapolation

DASY uses the advanced extrapolation option which is able to compensate boundary effects on E-field probes.

SAM PHANTOM

The SAM Twin Phantom V4.0 is constructed of a fiberglass shell integrated in a wooden table. The shape of the shell is based on data from an anatomical study designed to determine the maximum exposure in at least 90% of all users. It enables the dosimetric evaluation of left and right hand phone usage as well as body mounted usage at the flat phantom region. A cover prevents the evaporation of the liquid. Reference markings on the Phantom allow the complete setup of all predefined phantom positions and measurement grids by manually teaching three points in the robot. (see Fig. 2.6)

Phantom Specification

Phantom: SAM Twin Phantom (V4.0)
Shell Material: Vivac Composite
Thickness: 2.0 ± 0.2 mm

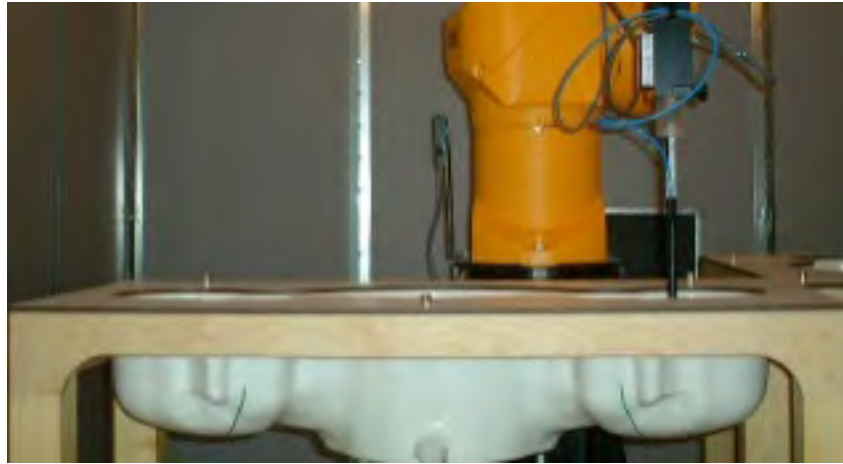


Figure 2.6 SAM Twin Phantom

Device Holder for Transmitters

In combination with the SAM Twin Phantom V4.0 the Mounting Device (see Fig. 2.7), enables the rotation of the mounted transmitter in spherical coordinates whereby the rotation point is the ear opening. The devices can be easily, accurately, and repeatedly positioned according to the FCC, CENELEC, IEC and IEEE specifications. The device holder can be locked at different phantom locations (left head, right head, flat phantom).



Figure 2.7 Mounting Device

Note: A simulating human hand is not used due to the complex anatomical and geometrical structure of the hand that may produce infinite number of configurations. To produce the worst-case condition (the hand absorbs antenna output power), the hand is omitted during the tests.

3. Probe and Dipole Calibration

See Appendix D and E.

4. Phantom & Simulating Tissue Specifications

Head & Body Simulating Mixture Characterization

The head and body mixtures consist of the material based on the table listed below. The mixture is calibrated to obtain proper dielectric constant (permittivity) and conductivity of the desired tissue. Body tissue parameters that have not been specified in IEEE1528 – 2013 are derived from the issue dielectric parameters computed from the 4-Cole-Cole equations.

Table 4.1 Typical Composition of Ingredients for Tissue

Ingredients		Simulating Tissue
		2450 MHz Body
Mixing Percentage		
Water		73.20
Sugar		0.00
Salt		0.04
HEC		0.00
Bactericide		0.00
DGBE		26.70
Dielectric Constant	Target	52.70
Conductivity (S/m)	Target	1.95

5. ANSI/IEEE C95.1 – 1992 RF Exposure Limits [2]

Uncontrolled Environment

Uncontrolled Environments are defined as locations where there is the exposure of individuals who have no knowledge or control of their exposure. The general population/uncontrolled exposure limits are applicable to situations in which the general public may be exposed or in which persons who are exposed as a consequence of their employment may not be made fully aware of the potential for exposure or cannot exercise control over their exposure. Members of the general public would come under this category when exposure is not employment-related; for example, in the case of a wireless transmitter that exposes persons in its vicinity.

Controlled Environment

Controlled Environments are defined as locations where there is exposure that may be incurred by persons who are aware of the potential for exposure, (i.e. as a result of employment or occupation). In general, occupational/controlled exposure limits are applicable to situations in which persons are exposed as a consequence of their employment, who have been made fully aware of the potential for exposure and can exercise control over their exposure. This exposure category is also applicable when the exposure is of a transient nature due to incidental passage through a location where the exposure levels may be higher than the general population/uncontrolled limits, but the exposed person is fully aware of the potential for exposure and can exercise control over his or her exposure by leaving the area or by some other appropriate means.

Table 5.1 Human Exposure Limits

	UNCONTROLLED ENVIRONMENT General Population (W/kg) or (mW/g)	CONTROLLED ENVIROMENT Professional Population (W/kg) or (mW/g)
SPATIAL PEAK SAR ¹ Head	1.60	8.00
SPATIAL AVERAGE SAR ² Whole Body	0.08	0.40
SPATIAL PEAK SAR ³ Hands, Feet, Ankles, Wrists	4.00	20.00

¹ The Spatial Peak value of the SAR averaged over any 1 gram of tissue (defined as a tissue volume in the shape of a cube) and over the appropriate averaging time.

² The Spatial Average value of the SAR averaged over the whole body.

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

6. Measurement Uncertainty

Measurement uncertainty table is not required per KDB 865664 D01 v01r04 section 2.8.2 page 12. SAR measurement uncertainty analysis is required in the SAR report only when the highest measured SAR in a frequency band is ≥ 1.5 W/kg for 1-g SAR. The equivalent ratio (1.5/1.6) should be applied to extremity and occupational exposure conditions. The highest reported value is less than 1.5 W/kg. Therefore, the measurement uncertainty table is not required.

7. System Verification

Tissue Verification

Table 7.1 Measured Tissue Parameters

		2450 MHz Body		2450 MHz Body	
Date(s)		Jun. 20, 2019		Aug. 26, 2019	
Liquid Temperature (°C)	20.0	Target	Measured	Target	Measured
Dielectric Constant: ϵ		52.70	52.58	52.70	52.58
Conductivity: σ		1.95	2.00	1.95	1.92

See Appendix A for data printout.

Test System Verification

Prior to assessment, the system is verified to the $\pm 10\%$ of the specifications at the test frequency by using the system kit. Power is normalized to 1 watt. (Graphic Plots Attached)

Table 7.2 System Dipole Verification Target & Measured

	Test Frequency	Targeted SAR _{1g} (W/kg)	Measure SAR _{1g} (W/kg)	Tissue Used for Verification	Deviation (%)	Plot Number
20-Jun-2019	2450 MHz	51.00	52.00	Body	+ 1.96	1
26-Aug-2019	2450 MHz	51.00	52.20	Body	+ 2.35	2

See Appendix A for data plots.

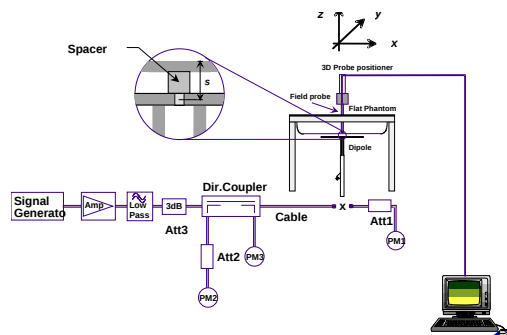


Figure 7.1 Dipole Verification Test Setup

8. SAR Test Data Summary

See Measurement Result Data Pages

See Appendix B for SAR Test Data Plots.
See Appendix C for SAR Test Setup Photos.

Procedures Used To Establish Test Signal

The device was either placed into simulated transmit mode using the manufacturer's test codes or the actual transmission is activated through a base station simulator or similar equipment. See data pages for actual procedure used in measurement.

Device Test Condition

In order to verify that the device was tested at full power, conducted output power measurements were performed before and after each SAR measurement to confirm the output power unless otherwise noted. If a conducted power deviation of more than 5% occurred, the test was repeated. The power drift of each test is measured at the start of the test and again at the end of the test. The drift percentage is calculated by the formula $((\text{end}/\text{start}) - 1) * 100$ and rounded to three decimal places. The drift percentage is calculated into the resultant SAR value on the data sheet for each test.

The testing was conducted on the front and back of the unit with 0 mm gap. The device would only be next to the body for the front and back. Therefore, all remaining sides were not tested.

All measurements were conducted with the device on a minimum of 10 cm of Styrofoam.

The data rates used when evaluating the WiFi transmitter were the lowest data rates for each mode. The device was operating at its maximum output power at the lowest data rate for all measurements.

Conducted Power Measurements

Band	Mode	Bandwidth (MHz)	Channel	Frequency (MHz)	Data Rate	Antenna	Avg Power (dBm)	Tune-up Pwr (dBm)
2450 MHz	802.11b	20	1	2412	1 Mbps	Chain A	18.81	19.0
			6	2437			18.40	19.0
			11	2462			18.70	19.0
	802.11g	20	1	2412	6 Mbps	Chain A	15.18	18.0
			6	2437			17.35	18.0
			11	2462			15.58	18.0
	802.11n	20	1	2412	HT0	Chain A	14.82	18.0
			6	2437			17.09	18.0
			11	2462			15.25	18.0

Figure 8.1 Test Reduction Table – 2.4 GHz

Mode	Side	Required Channel	Tested/Reduced
802.11b	Back	1 – 2412 MHz	Tested
		6 – 2437 MHz	Tested
		11 – 2462 MHz	Tested
	Front	1 – 2412 MHz	Tested
		6 – 2437 MHz	Tested
		11 – 2462 MHz	Tested
802.11g	Back	1 – 2412 MHz	Reduced ³
		6 – 2437 MHz	Reduced ³
		11 – 2462 MHz	Reduced ³
	Front	1 – 2412 MHz	Reduced ³
		6 – 2437 MHz	Reduced ³
		11 – 2462 MHz	Reduced ³
802.11n	Back	1 – 2412 MHz	Reduced ³
		6 – 2437 MHz	Reduced ³
		11 – 2462 MHz	Reduced ³
	Front	1 – 2412 MHz	Reduced ³
		6 – 2437 MHz	Reduced ³
		11 – 2462 MHz	Reduced ³

Reduced¹ – When the reported SAR is ≤ 0.4 W/kg, SAR is not required for the remaining test configuration per KDB 248227 D01 v02r02 section 5.1.1 1) page 9.

Reduced² – When the reported SAR is >0.4 W/kg, test the next highest configuration until the SAR value is ≤ 0.8 W/kg per KDB 248227 D01 v02r02 section 5.1.1 2) page 9.

Reduced³ – 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 ≤ 1.2 W/kg, SAR is not required per KDB 248227 D01 v02r02 section 5.2.2 2) page 10.

SAR Data Summary – 2450 MHz Body 802.11b

MEASUREMENT RESULTS								
Plot	Gap	Position	Frequency		Modulation	End Power	Measured SAR (W/kg)	Reported SAR (W/kg)
			MHz	Ch.		(dBm)		
-----	0 mm	Back	2412	1	DSSS	18.81	0.0126	0.01
-----			2437	6	DSSS	18.40	0.0131	0.02
-----			2462	11	DSSS	18.70	0.0127	0.01
1		Back With Carabiner	2437	6	DSSS	18.40	0.0158	0.02
-----		Front	2412	1	DSSS	18.81	0.0102	0.01
-----			2437	6	DSSS	18.40	0.0113	0.01
-----			2462	11	DSSS	18.70	0.0108	0.01
-----		Front With Carabiner	2437	6	DSSS	18.40	0.0121	0.01
					Body 1.6 W/kg (mW/g) averaged over 1 gram			

- Battery is fully charged for all tests.
 Power Measured ☒ Conducted ☐ ERP ☐ EIRP
- SAR Measurement
 Phantom Configuration ☐ Left Head ☒ Eli4 ☐ Right Head
 SAR Configuration ☐ Head ☒ Body
- Test Signal Call Mode ☒ Test Code ☐ Base Station Simulator
- Test Configuration ☐ With Belt Clip ☐ Without Belt Clip ☒ N/A
- Tissue Depth is at least 15.0 cm



Jay M. Moulton
Vice President

9. Test Equipment List

Table 9.1 Equipment Specifications

Type	Calibration Due Date	Calibration Done Date	Serial Number
Staubli Robot TX60L	N/A	N/A	F07/55M6A1/A/01
Measurement Controller CS8c	N/A	N/A	1012
ELI4 Flat Phantom	N/A	N/A	1065
Device Holder	N/A	N/A	N/A
Data Acquisition Electronics 4	08/20/2019	08/20/2018	759
Data Acquisition Electronics 4	02/15/2020	02/15/2019	1217
SPEAG E-Field Probe EX3DV4	06/03/2020	06/03/2019	7531
Speag Validation Dipole D2450V2	07/12/2020	07/12/2018	829
Agilent N1911A Power Meter	04/27/2020	04/27/2019	GB45100254
Agilent N1922A Power Sensor	04/27/2020	04/27/2019	MY45240464
Advantest R3261A Spectrum Analyzer	03/25/2020	03/25/2019	31720068
Agilent (HP) 8350B Signal Generator	03/20/2020	03/20/2019	2749A10226
Agilent (HP) 83525A RF Plug-In	03/20/2020	03/20/2019	2647A01172
Agilent (HP) 8753C Vector Network Analyzer	03/20/2020	03/20/2019	3135A01724
Agilent (HP) 85047A S-Parameter Test Set	03/20/2020	03/20/2019	2904A00595
Agilent (HP) 8960 Base Station Sim.	03/19/2020	03/19/2019	MY48360364
Anritsu MT8820C	01/26/2020	01/26/2019	6201176199
Agilent 778D Dual Directional Coupler	N/A	N/A	MY48220184
MiniCircuits BW-N20W5+ Fixed 20 dB Attenuator	N/A	N/A	N/A
MiniCircuits SPL-10.7+ Low Pass Filter	N/A	N/A	R8979513746
Apriel Dielectric Probe Assembly	N/A	N/A	0011
Body Equivalent Matter (2450 MHz)	N/A	N/A	N/A

10. Conclusion

The SAR measurement indicates that the EUT complies with the RF radiation exposure limits of the FCC/IC. These measurements are taken to simulate the RF effects exposure under worst-case conditions. Precise laboratory measures were taken to assure repeatability of the tests. The tested device complies with the requirements in respect to all parameters subject to the test. The test results and statements relate only to the item(s) tested.

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

11. References

- [1] Federal Communications Commission, ET Docket 93-62, Guidelines for Evaluating the Environmental Effects of Radio Frequency Radiation, August 1996
- [2] ANSI/IEEE C95.1 – 1992, American National Standard Safety Levels with respect to Human Exposure to Radio Frequency Electromagnetic Fields, 300kHz to 100GHz, New York: IEEE, 1992.
- [3] ANSI/IEEE C95.3 – 2002, IEEE Recommended Practice for the Measurement of Potentially Hazardous Electromagnetic Fields – RF and Microwave, New York: IEEE, 2002.
- [4] International Electrotechnical Commission, IEC 62209-2 (Edition 1.0), Human Exposure to radio frequency fields from hand-held and body mounted wireless communication devices – Human models, instrumentation, and procedures – Part 2: Procedure to determine the specific absorption rate (SAR) for wireless communication devices used in close proximity to the human body (frequency range of 30 MHz to 6 GHz), March 2010.
- [5] IEEE Standard 1528 – 2013, IEEE Recommended Practice for Determining the Peak-Spatial Average Specific Absorption Rate (SAR) in the Human Head from Wireless Communication Devices: Measurement Techniques, June 2013.
- [6] Industry Canada, RSS – 102 Issue 5, Radio Frequency Exposure Compliance of Radiocommunication Apparatus (All Frequency Bands), March 2015.
- [7] Health Canada, Safety Code 6, Limits of Human Exposure to Radiofrequency Electromagnetic Fields in the Frequency Range from 3kHz to 300 GHz, 2009.

Appendix A – System Verification Plots and Data

Test Result for UIM Dielectric Parameter

Thu 20/Jun/2019

Freq Frequency(GHz)

FCC_eB Limits for Body Epsilon

FCC_sB Limits for Body Sigma

Test_e Epsilon of UIM

Test_s Sigma of UIM

Freq	FCC_eB	FCC_sB	Test_e	Test_s
2.4100	52.75	1.91	52.66	1.95
2.4120	52.748	1.912	52.656	1.952*
2.4200	52.74	1.92	52.64	1.96
2.4300	52.73	1.93	52.62	1.97
2.4370	52.716	1.937	52.606	1.984*
2.4400	52.71	1.94	52.60	1.99
2.4500	52.70	1.95	52.58	2.00
2.4600	52.69	1.96	52.57	2.01
2.4620	52.686	1.964	52.566	2.012*
2.4700	52.67	1.98	52.55	2.02
2.4800	52.66	1.99	52.53	2.03

* value interpolated

Test Result for UIM Dielectric Parameter

Mon 26/Aug/2019

Freq Frequency(GHz)

FCC_eB Limits for Body Epsilon

FCC_sB Limits for Body Sigma

Test_e Epsilon of UIM

Test_s Sigma of UIM

Freq	FCC_eB	FCC_sB	Test_e	Test_s
2.4100	52.75	1.91	52.85	1.88
2.4120	52.748	1.912	52.846	1.882*
2.4200	52.74	1.92	52.83	1.89
2.4300	52.73	1.93	52.81	1.90
2.4370	52.716	1.937	52.796	1.907*
2.4400	52.71	1.94	52.79	1.91
2.4500	52.70	1.95	52.77	1.92
2.4600	52.69	1.96	52.75	1.93
2.4620	52.686	1.964	52.746	1.932*
2.4700	52.67	1.98	52.73	1.94
2.4800	52.66	1.99	52.71	1.95

* value interpolated

RF Exposure Lab

Plot 1

DUT: Dipole 2450 MHz D2450V2; Type: D2450V2; Serial: D2450V2 - SN: 829

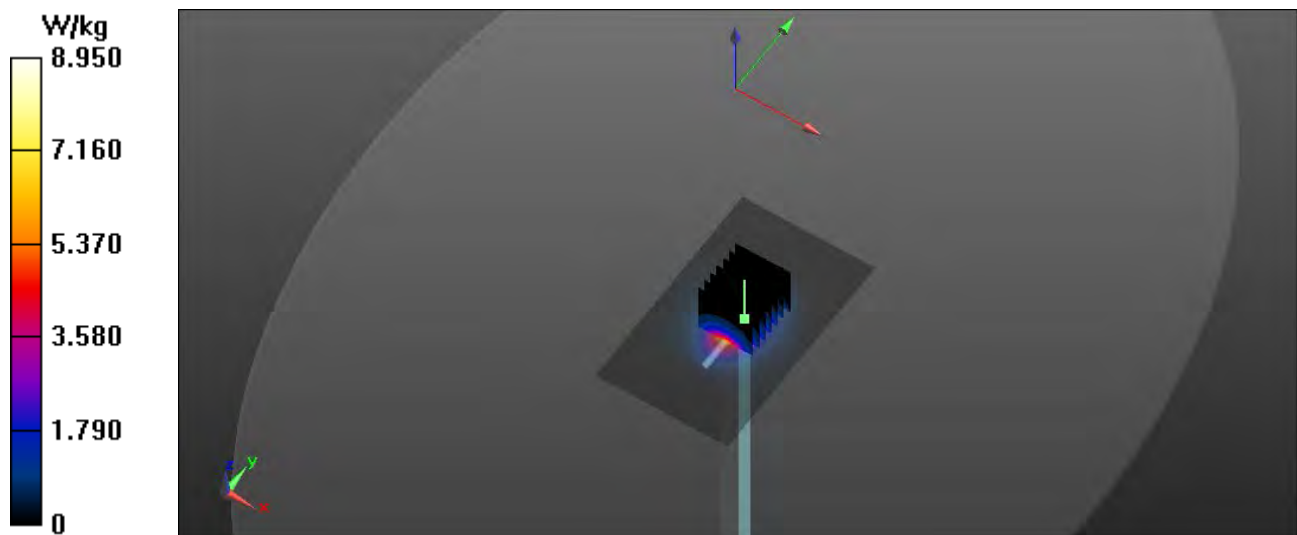
Communication System: CW; Frequency: 2450 MHz; Duty Cycle: 1:1
Medium: MSL2450; Medium parameters used: $f = 2450$ MHz; $\sigma = 2$ S/m; $\epsilon_r = 52.58$; $\rho = 1000$ kg/m³
Phantom section: Flat Section

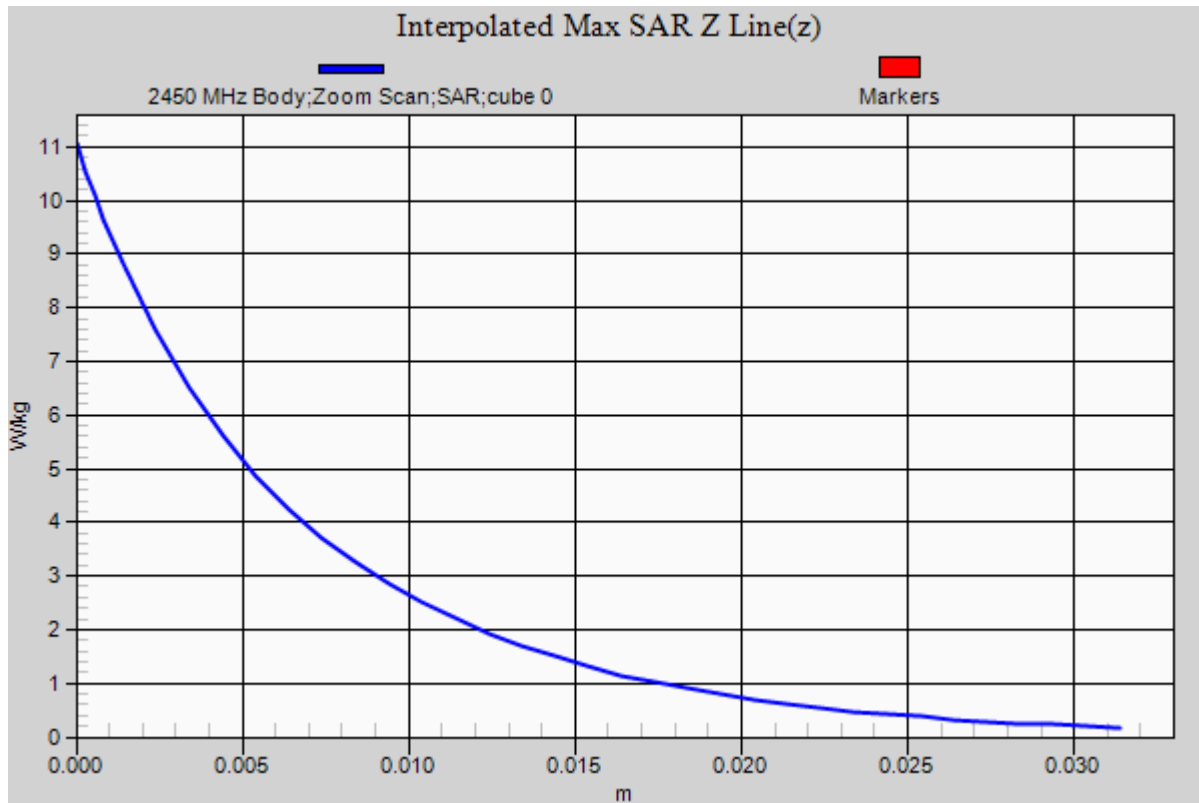
Test Date: Date: 6/20/2019; Ambient Temp: 23 °C; Tissue Temp: 21 °C
Probe: EX3DV4 – SN7531; ConvF(7.62, 7.62, 7.62); Calibrated: 6/3/2019;
Sensor-Surface: 2mm (Mechanical Surface Detection)
Electronics: DAE4 Sn759; Calibrated: 8/20/2018
Phantom: ELI v4.0; Type: QDOVA001BB; Serial: 1065
Measurement SW: DASY52, Version 52.10 (0); SEMCAD X Version 14.6.10 (7417)

Procedure Notes:

Body Verification/2450 MHz/Area Scan (61x101x1): Interpolated grid: dx=1.200 mm, dy=1.200 mm
Maximum value of SAR (interpolated) = 8.85 W/kg

Body Verification/2450 MHz/Zoom Scan (7x7x7)/Cube 0: Measurement grid: dx=5mm, dy=5mm, dz=5mm
Reference Value = 54.243 V/m; Power Drift = -0.01 dB
Peak SAR (extrapolated) = 11.1 W/kg
 $P_{in}=100$ mW
SAR(1 g) = 5.2 W/kg; SAR(10 g) = 2.41 W/kg
Maximum value of SAR (measured) = 8.93 W/kg





RF Exposure Lab

Plot 2

DUT: Dipole 2450 MHz D2450V2; Type: D2450V2; Serial: D2450V2 - SN: 829

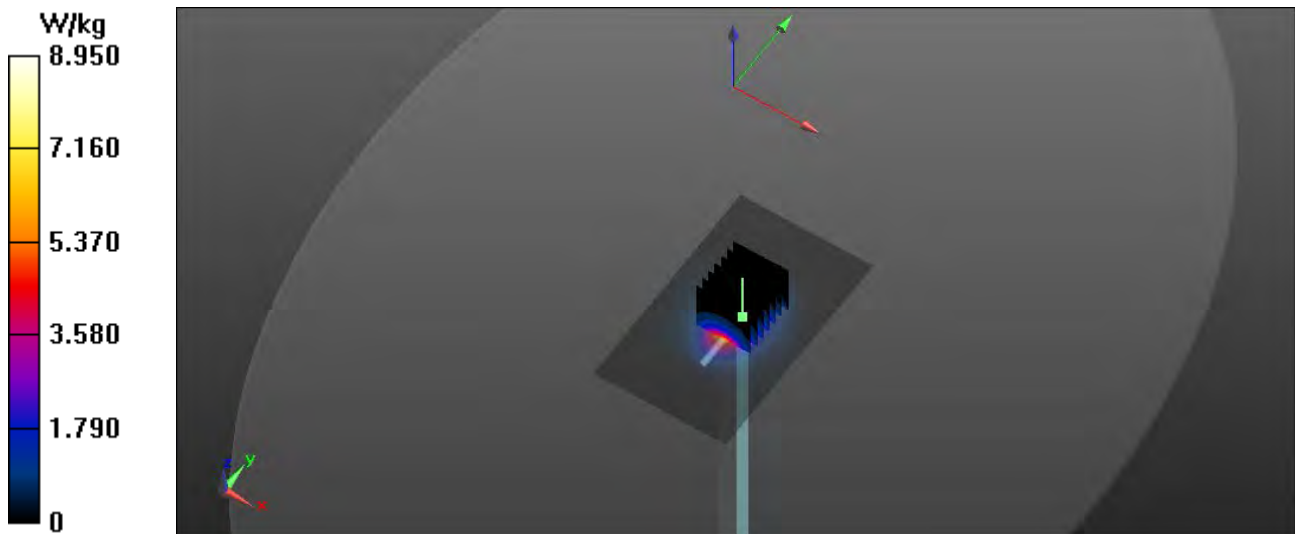
Communication System: CW; Frequency: 2450 MHz; Duty Cycle: 1:1
Medium: MSL2450; Medium parameters used: $f = 2450$ MHz; $\sigma = 1.92$ S/m; $\epsilon_r = 52.77$; $\rho = 1000$ kg/m³
Phantom section: Flat Section

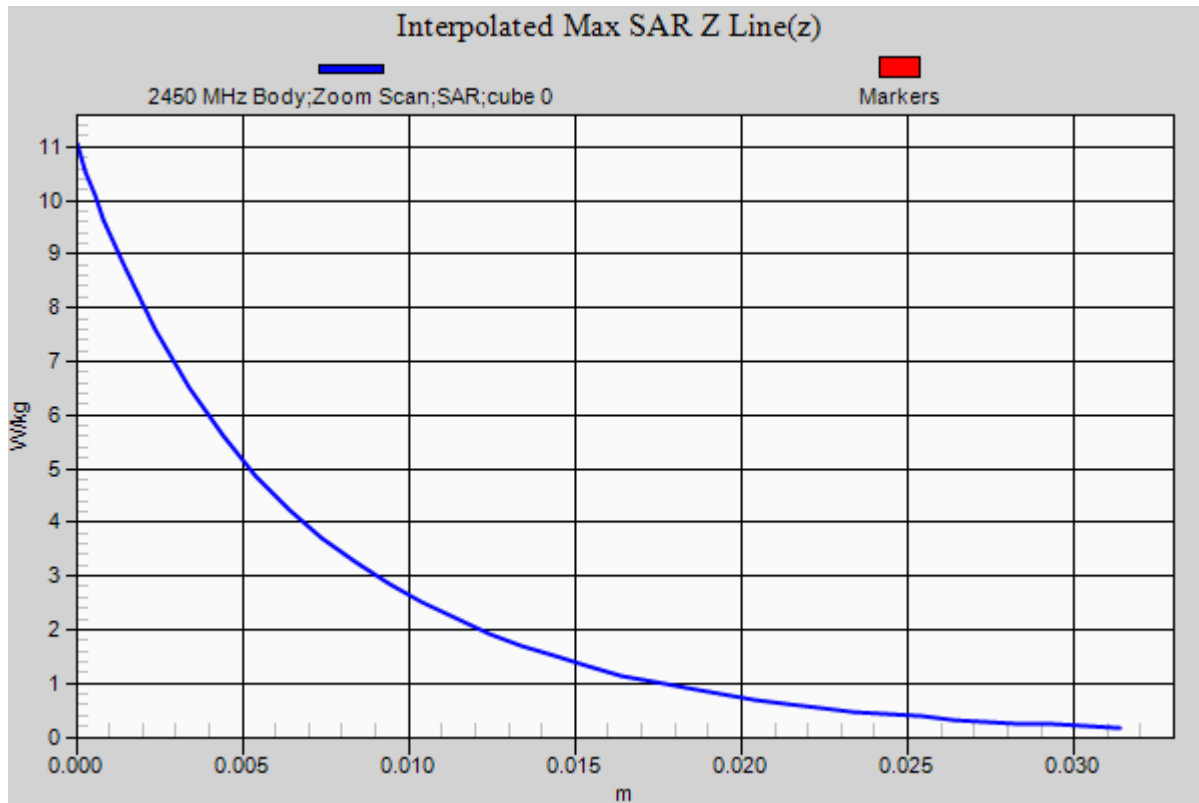
Test Date: Date: 8/26/2019; Ambient Temp: 23 °C; Tissue Temp: 21 °C
Probe: EX3DV4 – SN7531; ConvF(7.62, 7.62, 7.62); Calibrated: 6/3/2019;
Sensor-Surface: 2mm (Mechanical Surface Detection)
Electronics: DAE4 Sn1217; Calibrated: 2/15/2019
Phantom: ELI v4.0; Type: QDOVA001BB; Serial: 1065
Measurement SW: DASY52, Version 52.10 (0); SEMCAD X Version 14.6.10 (7417)

Procedure Notes:

Body Verification/2450 MHz/Area Scan (61x101x1): Interpolated grid: dx=1.200 mm, dy=1.200 mm
Maximum value of SAR (interpolated) = 8.92 W/kg

Body Verification/2450 MHz/Zoom Scan (7x7x7)/Cube 0: Measurement grid: dx=5mm, dy=5mm, dz=5mm
Reference Value = 53.359 V/m; Power Drift = -0.02 dB
Peak SAR (extrapolated) = 11.04 W/kg
SAR(1 g) = 5.22 W/kg; SAR(10 g) = 2.47 W/kg
Maximum value of SAR (measured) = 8.79 W/kg





Appendix B – SAR Test Data Plots

RF Exposure Lab

Plot 1

DUT: AA3556; Type: Satellite Location Device; Serial: Eng 1

Communication System: WiFi 802.11b (DSSS, 1 Mbps); Frequency: 2437 MHz; Duty Cycle: 1:1
Medium: MSL2450; Medium parameters used (interpolated): $f = 2437$ MHz; $\sigma = 1.907$ S/m; $\epsilon_r = 52.796$; $\rho = 1000$ kg/m³
Phantom section: Flat Section

Test Date: Date: 8/26/2019; Ambient Temp: 23 °C; Tissue Temp: 21 °C

Probe: EX3DV4 – SN7531; ConvF(7.62, 7.62, 7.62); Calibrated: 6/3/2019;
Sensor-Surface: 2mm (Mechanical Surface Detection)
Electronics: DAE4 Sn1217; Calibrated: 2/15/2019
Phantom: ELI v4.0; Type: QDOVA001BB; Serial: 1065
Measurement SW: DASY52, Version 52.10 (0); SEMCAD X Version 14.6.10 (7417)

Procedure Notes:

2450 MHz NA/Back Mid/Area Scan (8x16x1): Measurement grid: dx=12mm, dy=12mm

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

Maximum value of SAR (measured) = 0.0186 W/kg

2450 MHz NA/Back Mid/Zoom Scan (7x7x7)/Cube 0: Measurement grid: dx=5mm, dy=5mm, dz=5mm

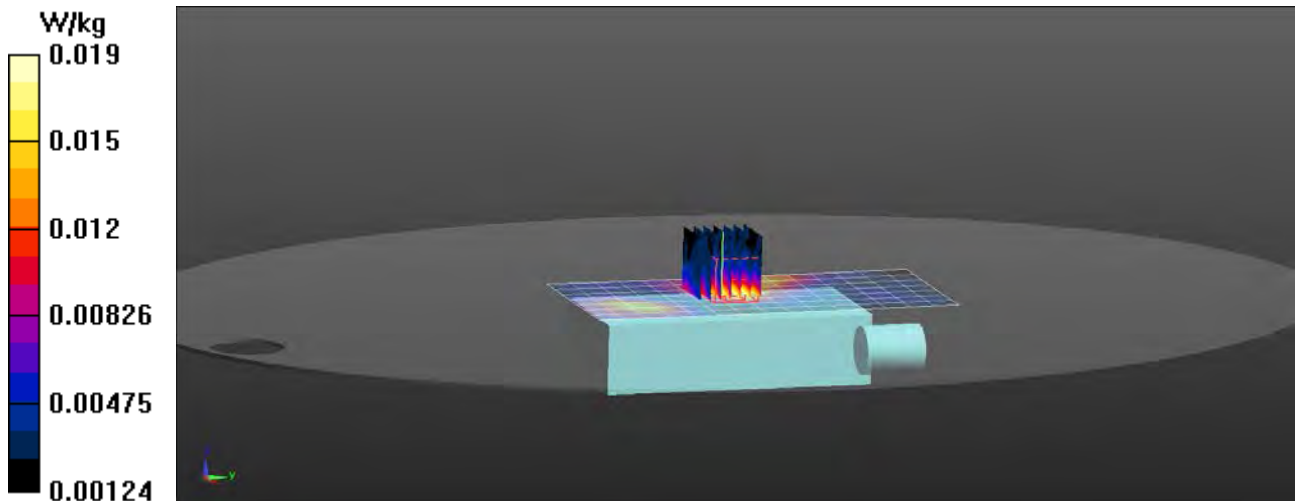
Reference Value = 2.980 V/m; Power Drift = -0.02 dB

Peak SAR (extrapolated) = 0.0280 W/kg

SAR(1 g) = 0.016 W/kg; SAR(10 g) = 0.00982 W/kg

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

Maximum value of SAR (measured) = 0.0188 W/kg



Appendix D – Probe Calibration Data Sheets



Accredited by the Swiss Accreditation Service (SAS)

The Swiss Accreditation Service is one of the signatories to the EA
Multilateral Agreement for the recognition of calibration certificates

Accreditation No.: **SCS 0108**

Client **RF Exposure Lab**

Certificate No: **EX3-7531_Jun19**

CALIBRATION CERTIFICATE

Object **EX3DV4 - SN:7531**

Calibration procedure(s) **QA CAL-01.v9, QA CAL-12.v9, QA CAL-14.v5, QA CAL-23.v5,
QA CAL-25.v7
Calibration procedure for dosimetric E-field probes**

Calibration date: **June 3, 2019**

This calibration certificate documents the traceability to national standards, which realize the physical units of measurements (SI).
The measurements and the uncertainties with confidence probability are given on the following pages and are part of the certificate.

All calibrations have been conducted in the closed laboratory facility: environment temperature (22 ± 3)°C and humidity < 70%.

Calibration Equipment used (M&TE critical for calibration)

Primary Standards	ID	Cal Date (Certificate No.)	Scheduled Calibration
Power meter NRP	SN: 104778	03-Apr-19 (No. 217-02892/02893)	Apr-20
Power sensor NRP-Z91	SN: 103244	03-Apr-19 (No. 217-02892)	Apr-20
Power sensor NRP-Z91	SN: 103245	03-Apr-19 (No. 217-02893)	Apr-20
Reference 20 dB Attenuator	SN: S5277 (20x)	04-Apr-19 (No. 217-02894)	Apr-20
DAE4	SN: 660	19-Dec-18 (No. DAE4-660_Dec18)	Dec-19
Reference Probe ES3DV2	SN: 3013	31-Dec-18 (No. ES3-3013_Dec18)	Dec-19
Secondary Standards	ID	Check Date (in house)	Scheduled Check
Power meter E4419B	SN: GB41293874	06-Apr-16 (in house check Jun-18)	In house check: Jun-20
Power sensor E4412A	SN: MY41498087	06-Apr-16 (in house check Jun-18)	In house check: Jun-20
Power sensor E4412A	SN: 000110210	06-Apr-16 (in house check Jun-18)	In house check: Jun-20
RF generator HP 8648C	SN: US3642U01700	04-Aug-99 (in house check Jun-18)	In house check: Jun-20
Network Analyzer E8358A	SN: US41080477	31-Mar-14 (in house check Oct-18)	In house check: Oct-19

Calibrated by:	Name Jeton Kastrati	Function Laboratory Technician	Signature
Approved by:	Name Katja Pokovic	Function Technical Manager	Signature

Issued: June 3, 2019

This calibration certificate shall not be reproduced except in full without written approval of the laboratory.



Accredited by the Swiss Accreditation Service (SAS)

The Swiss Accreditation Service is one of the signatories to the EA
Multilateral Agreement for the recognition of calibration certificates

Accreditation No.: **SCS 0108**

Glossary:

TSL	tissue simulating liquid
NORM _{x,y,z}	sensitivity in free space
ConvF	sensitivity in TSL / NORM _{x,y,z}
DCP	diode compression point
CF	crest factor (1/duty_cycle) of the RF signal
A, B, C, D	modulation dependent linearization parameters
Polarization φ	φ rotation around probe axis
Polarization ϑ	ϑ rotation around an axis that is in the plane normal to probe axis (at measurement center), i.e., $\vartheta = 0$ is normal to probe axis
Connector Angle	information used in DASY system to align probe sensor X to the robot coordinate system

Calibration is Performed According to the Following Standards:

- IEEE Std 1528-2013, "IEEE Recommended Practice for Determining the Peak Spatial-Averaged Specific Absorption Rate (SAR) in the Human Head from Wireless Communications Devices: Measurement Techniques", June 2013
- IEC 62209-1, "Measurement procedure for the assessment of Specific Absorption Rate (SAR) from hand-held and body-mounted devices used next to the ear (frequency range of 300 MHz to 6 GHz)", July 2016
- IEC 62209-2, "Procedure to determine the Specific Absorption Rate (SAR) for wireless communication devices used in close proximity to the human body (frequency range of 30 MHz to 6 GHz)", March 2010
- KDB 865664, "SAR Measurement Requirements for 100 MHz to 6 GHz"

Methods Applied and Interpretation of Parameters:

- NORM_{x,y,z}**: Assessed for E-field polarization $\vartheta = 0$ ($f \leq 900$ MHz in TEM-cell; $f > 1800$ MHz: R22 waveguide). NORM_{x,y,z} are only intermediate values, i.e., the uncertainties of NORM_{x,y,z} does not affect the E²-field uncertainty inside TSL (see below ConvF).
- NORM(f)_{x,y,z}** = NORM_{x,y,z} * frequency_response (see Frequency Response Chart). This linearization is implemented in DASY4 software versions later than 4.2. The uncertainty of the frequency response is included in the stated uncertainty of ConvF.
- DCP_{x,y,z}**: DCP are numerical linearization parameters assessed based on the data of power sweep with CW signal (no uncertainty required). DCP does not depend on frequency nor media.
- PAR**: PAR is the Peak to Average Ratio that is not calibrated but determined based on the signal characteristics
- A_{x,y,z}; B_{x,y,z}; C_{x,y,z}; D_{x,y,z}; VR_{x,y,z}**: A, B, C, D are numerical linearization parameters assessed based on the data of power sweep for specific modulation signal. The parameters do not depend on frequency nor media. VR is the maximum calibration range expressed in RMS voltage across the diode.
- ConvF and Boundary Effect Parameters**: Assessed in flat phantom using E-field (or Temperature Transfer Standard for $f \leq 800$ MHz) and inside waveguide using analytical field distributions based on power measurements for $f > 800$ MHz. The same setups are used for assessment of the parameters applied for boundary compensation (alpha, depth) of which typical uncertainty values are given. These parameters are used in DASY4 software to improve probe accuracy close to the boundary. The sensitivity in TSL corresponds to NORM_{x,y,z} * ConvF whereby the uncertainty corresponds to that given for ConvF. A frequency dependent ConvF is used in DASY version 4.4 and higher which allows extending the validity from ± 50 MHz to ± 100 MHz.
- Spherical isotropy (3D deviation from isotropy)**: in a field of low gradients realized using a flat phantom exposed by a patch antenna.
- Sensor Offset**: The sensor offset corresponds to the offset of virtual measurement center from the probe tip (on probe axis). No tolerance required.
- Connector Angle**: The angle is assessed using the information gained by determining the NORM_x (no uncertainty required).

DASY/EASY - Parameters of Probe: EX3DV4 - SN:7531

Basic Calibration Parameters

	Sensor X	Sensor Y	Sensor Z	Unc (k=2)
Norm ($\mu\text{V}/(\text{V}/\text{m})^2$) ^A	0.39	0.47	0.39	$\pm 10.1 \%$
DCP (mV) ^B	97.9	95.2	100.9	

Calibration Results for Modulation Response

UID	Communication System Name		A dB	B dB $\sqrt{\mu\text{V}}$	C	D dB	VR mV	Max dev.	Unc ^E (k=2)
0	CW	X	0.0	0.0	1.0	0.00	139.8	$\pm 3.5 \%$	$\pm 4.7 \%$
		Y	0.0	0.0	1.0		132.9		
		Y	0.0	0.0	1.0		137.4		

The reported uncertainty of measurement is stated as the standard uncertainty of measurement multiplied by the coverage factor $k=2$, which for a normal distribution corresponds to a coverage probability of approximately 95%.

^A The uncertainties of Norm X,Y,Z do not affect the E^2 -field uncertainty inside TSL (see Pages 5 and 6).

^B Numerical linearization parameter: uncertainty not required.

^E Uncertainty is determined using the max. deviation from linear response applying rectangular distribution and is expressed for the square of the field value.

DASY/EASY - Parameters of Probe: EX3DV4 - SN:7531

Other Probe Parameters

Sensor Arrangement	Triangular
Connector Angle (°)	6.4
Mechanical Surface Detection Mode	enabled
Optical Surface Detection Mode	disabled
Probe Overall Length	337 mm
Probe Body Diameter	10 mm
Tip Length	9 mm
Tip Diameter	2.5 mm
Probe Tip to Sensor X Calibration Point	1 mm
Probe Tip to Sensor Y Calibration Point	1 mm
Probe Tip to Sensor Z Calibration Point	1 mm
Recommended Measurement Distance from Surface	1.4 mm

DASY/EASY - Parameters of Probe: EX3DV4 - SN:7531

Calibration Parameter Determined in Head Tissue Simulating Media

f (MHz) ^C	Relative Permittivity ^F	Conductivity (S/m) ^F	ConvF X	ConvF Y	ConvF Z	Alpha ^G	Depth ^G (mm)	Unc (k=2)
150	52.3	0.76	13.01	13.01	13.01	0.00	1.00	± 13.3 %
220	49.0	0.81	12.68	12.68	12.68	0.00	1.00	± 13.3 %
300	45.3	0.87	12.23	12.23	12.23	0.06	1.30	± 13.3 %
450	43.5	0.87	11.43	11.43	11.43	0.13	1.30	± 13.3 %
600	42.7	0.88	10.58	10.58	10.58	0.03	1.30	± 13.3 %
1450	40.5	1.20	8.85	8.85	8.85	0.38	0.80	± 12.0 %
1640	40.2	1.31	8.71	8.71	8.71	0.28	0.91	± 12.0 %
2450	39.2	1.80	7.58	7.58	7.58	0.28	0.96	± 12.0 %
5250	35.9	4.71	5.24	5.24	5.24	0.40	1.80	± 13.1 %
5600	35.5	5.07	4.69	4.69	4.69	0.40	1.80	± 13.1 %
5750	35.4	5.22	4.78	4.78	4.78	0.40	1.80	± 13.1 %

^C Frequency validity above 300 MHz of ± 100 MHz only applies for DASY v4.4 and higher (see Page 2), else it is restricted to ± 50 MHz. The uncertainty is the RSS of the ConvF uncertainty at calibration frequency and the uncertainty for the indicated frequency band. Frequency validity below 300 MHz is ± 10, 25, 40, 50 and 70 MHz for ConvF assessments at 30, 64, 128, 150 and 220 MHz respectively. Validity of ConvF assessed at 6 MHz is 4-9 MHz, and ConvF assessed at 13 MHz is 9-19 MHz. Above 5 GHz frequency validity can be extended to ± 110 MHz.

^F At frequencies below 3 GHz, the validity of tissue parameters (ϵ and σ) can be relaxed to ± 10% if liquid compensation formula is applied to measured SAR values. At frequencies above 3 GHz, the validity of tissue parameters (ϵ and σ) is restricted to ± 5%. The uncertainty is the RSS of the ConvF uncertainty for indicated target tissue parameters.

^G Alpha/Depth are determined during calibration. SPEAG warrants that the remaining deviation due to the boundary effect after compensation is always less than ± 1% for frequencies below 3 GHz and below ± 2% for frequencies between 3-6 GHz at any distance larger than half the probe tip diameter from the boundary.

DASY/EASY - Parameters of Probe: EX3DV4 - SN:7531

Calibration Parameter Determined in Body Tissue Simulating Media

f (MHz) ^C	Relative Permittivity ^F	Conductivity (S/m) ^F	ConvF X	ConvF Y	ConvF Z	Alpha ^G	Depth ^G (mm)	Unc (k=2)
150	61.9	0.80	12.57	12.57	12.57	0.00	1.00	± 13.3 %
220	60.2	0.86	12.08	12.08	12.08	0.00	1.00	± 13.3 %
300	58.2	0.92	11.64	11.64	11.64	0.03	1.20	± 13.3 %
450	56.7	0.94	11.18	11.18	11.18	0.09	1.20	± 13.3 %
600	56.1	0.95	10.55	10.55	10.55	0.08	1.20	± 13.3 %
1640	53.7	1.42	8.53	8.53	8.53	0.26	0.99	± 12.0 %
2450	52.7	1.95	7.62	7.62	7.62	0.28	0.95	± 12.0 %
5250	48.9	5.36	4.52	4.52	4.52	0.50	1.90	± 13.1 %
5600	48.5	5.77	4.01	4.01	4.01	0.50	1.90	± 13.1 %
5750	48.3	5.94	4.08	4.08	4.08	0.50	1.90	± 13.1 %

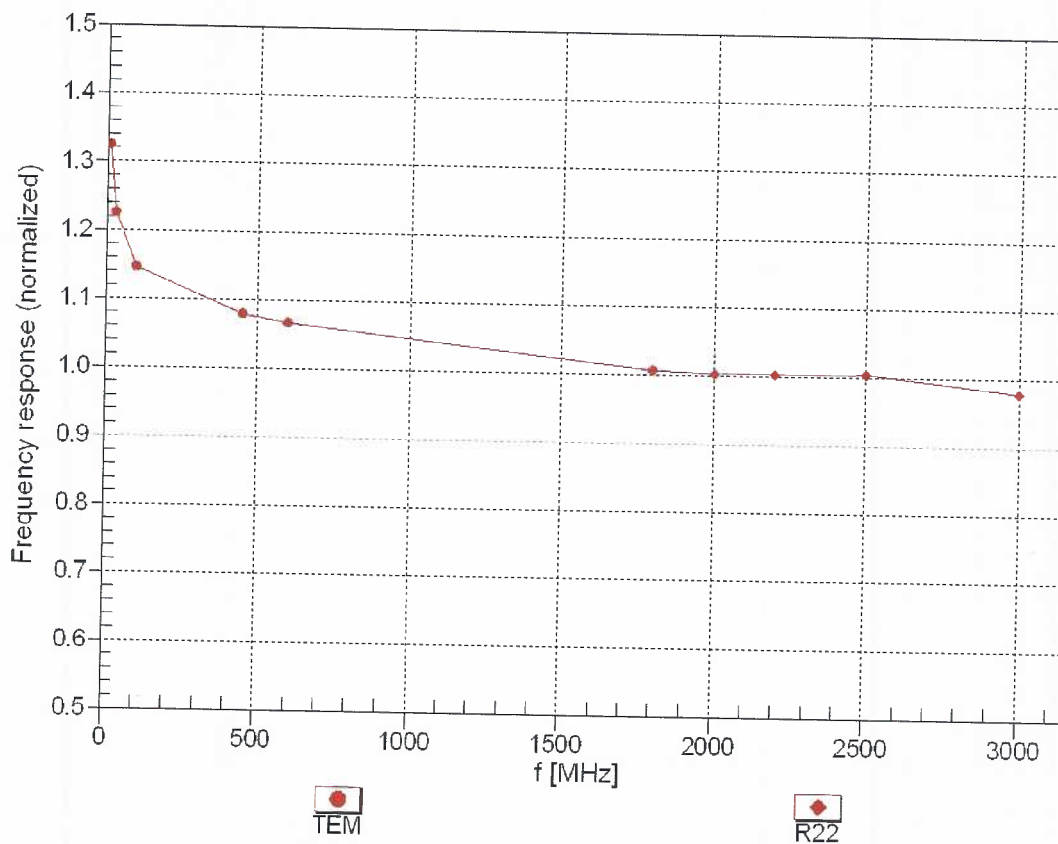
^C Frequency validity above 300 MHz of ± 100 MHz only applies for DASY v4.4 and higher (see Page 2), else it is restricted to ± 50 MHz. The uncertainty is the RSS of the ConvF uncertainty at calibration frequency and the uncertainty for the indicated frequency band. Frequency validity below 300 MHz is ± 10, 25, 40, 50 and 70 MHz for ConvF assessments at 30, 64, 128, 150 and 220 MHz respectively. Validity of ConvF assessed at 6 MHz is 4-9 MHz, and ConvF assessed at 13 MHz is 9-19 MHz. Above 5 GHz frequency validity can be extended to ± 110 MHz.

^F At frequencies below 3 GHz, the validity of tissue parameters (ϵ and σ) can be relaxed to ± 10% if liquid compensation formula is applied to measured SAR values. At frequencies above 3 GHz, the validity of tissue parameters (ϵ and σ) is restricted to ± 5%. The uncertainty is the RSS of the ConvF uncertainty for indicated target tissue parameters.

^G Alpha/Depth are determined during calibration. SPEAG warrants that the remaining deviation due to the boundary effect after compensation is always less than ± 1% for frequencies below 3 GHz and below ± 2% for frequencies between 3-6 GHz at any distance larger than half the probe tip diameter from the boundary.

Frequency Response of E-Field

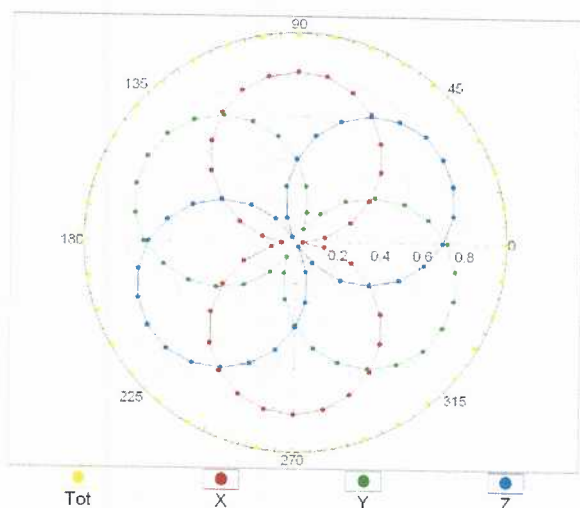
(TEM-Cell:ifi110 EXX, Waveguide: R22)



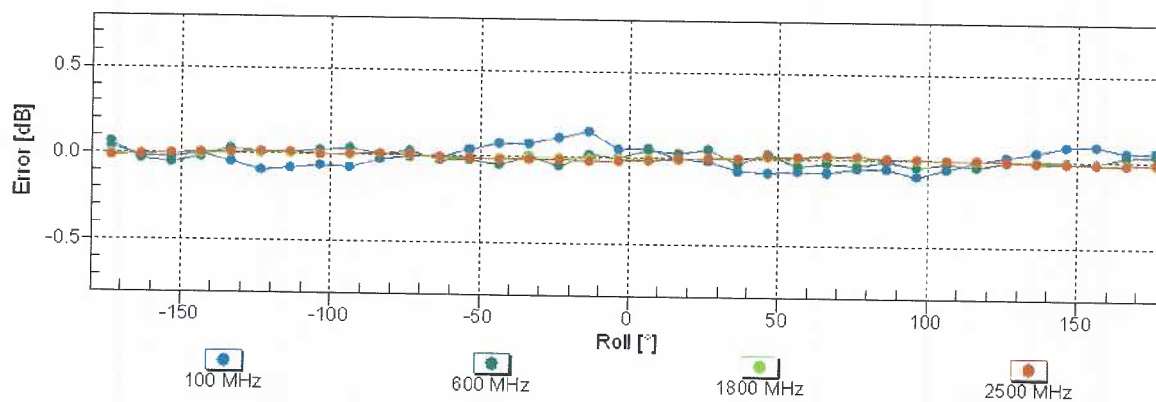
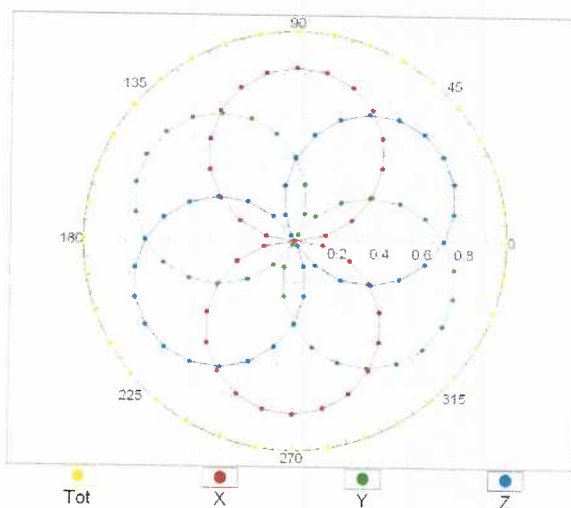
Uncertainty of Frequency Response of E-field: $\pm 6.3\%$ ($k=2$)

Receiving Pattern (ϕ), $\theta = 0^\circ$

f=600 MHz, TEM

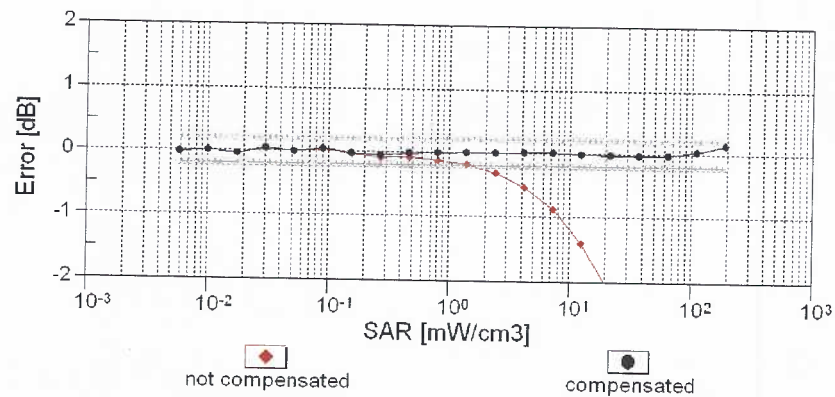
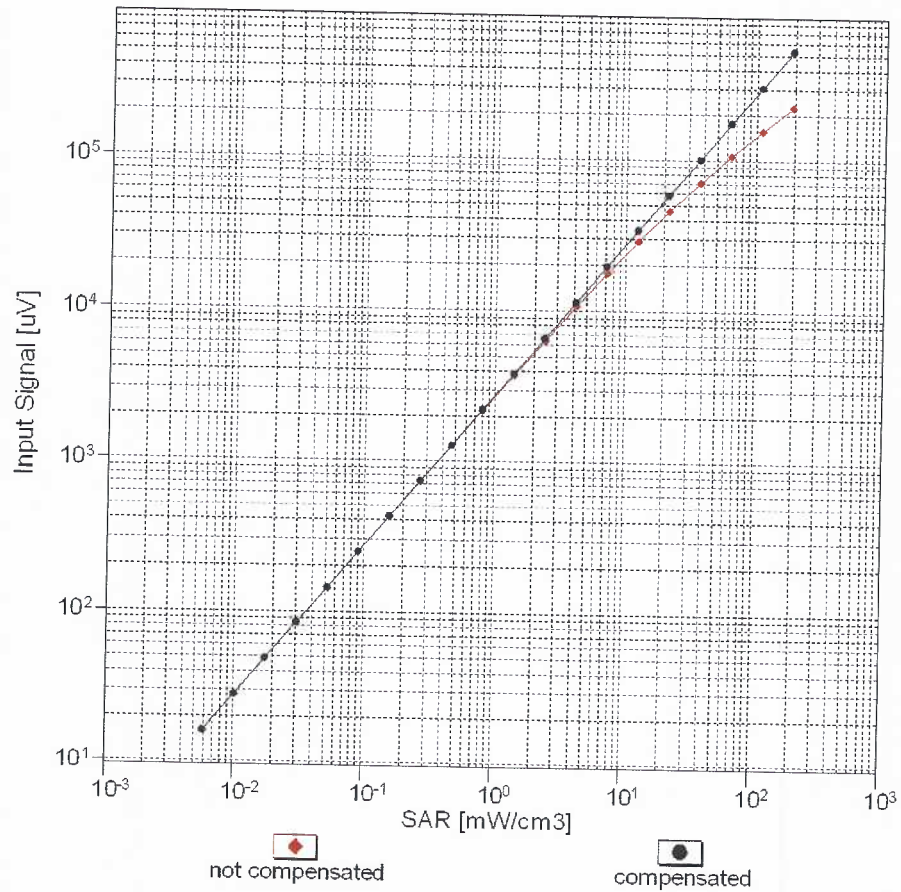


f=1800 MHz, R22



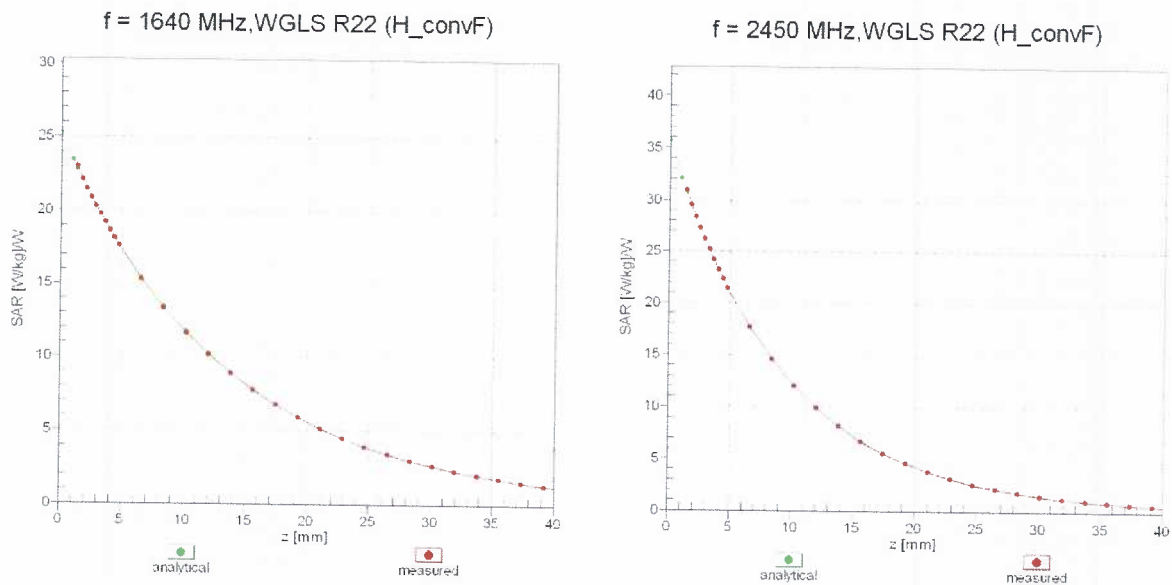
Uncertainty of Axial Isotropy Assessment: $\pm 0.5\%$ ($k=2$)

Dynamic Range $f(\text{SAR}_{\text{head}})$ (TEM cell , $f_{\text{eval}} = 1900 \text{ MHz}$)



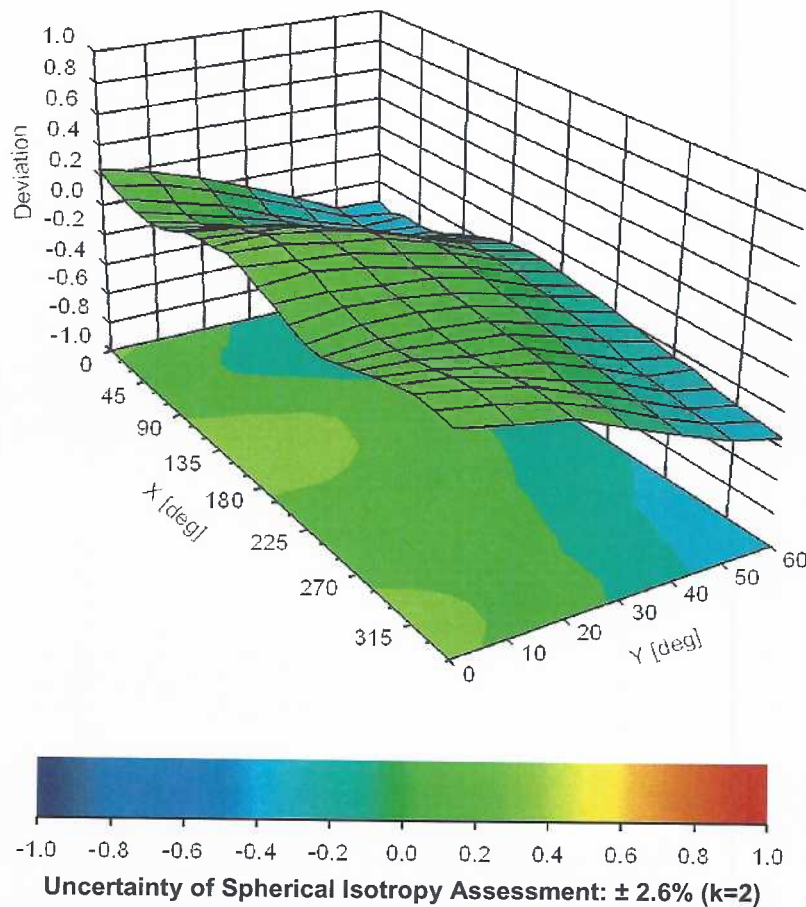
Uncertainty of Linearity Assessment: $\pm 0.6\%$ ($k=2$)

Conversion Factor Assessment



Deviation from Isotropy in Liquid

Error (ϕ, θ), $f = 900 \text{ MHz}$



Appendix E – Dipole Calibration Data Sheets



Accredited by the Swiss Accreditation Service (SAS)
 The Swiss Accreditation Service is one of the signatories to the EA
 Multilateral Agreement for the recognition of calibration certificates

Accreditation No.: **SCS 0108**

Client **RF Exposure Lab**

Certificate No: **D2450V2-829_Jul18**

CALIBRATION CERTIFICATE

Object **D2450V2 - SN:829**

Calibration procedure(s) **QA CAL-05.v10**
Calibration procedure for dipole validation kits above 700 MHz

Calibration date: **July 12, 2018**

This calibration certificate documents the traceability to national standards, which realize the physical units of measurements (SI).
 The measurements and the uncertainties with confidence probability are given on the following pages and are part of the certificate.

All calibrations have been conducted in the closed laboratory facility: environment temperature (22 ± 3)°C and humidity < 70%.

Calibration Equipment used (M&TE critical for calibration)

Primary Standards	ID #	Cal Date (Certificate No.)	Scheduled Calibration
Power meter NRP	SN: 104778	04-Apr-18 (No. 217-02672/02673)	Apr-19
Power sensor NRP-Z91	SN: 103244	04-Apr-18 (No. 217-02672)	Apr-19
Power sensor NRP-Z91	SN: 103245	04-Apr-18 (No. 217-02673)	Apr-19
Reference 20 dB Attenuator	SN: 5058 (20k)	04-Apr-18 (No. 217-02682)	Apr-19
Type-N mismatch combination	SN: 5047.2 / 06327	04-Apr-18 (No. 217-02683)	Apr-19
Reference Probe EX3DV4	SN: 7349	30-Dec-17 (No. EX3-7349_Dec17)	Dec-18
DAE4	SN: 601	26-Oct-17 (No. DAE4-601_Oct17)	Oct-18
Secondary Standards	ID #	Check Date (in house)	Scheduled Check
Power meter EPM-442A	SN: GB37480704	07-Oct-15 (in house check Oct-16)	In house check: Oct-18
Power sensor HP 8481A	SN: US37292783	07-Oct-15 (in house check Oct-16)	In house check: Oct-18
Power sensor HP 8481A	SN: MY41092317	07-Oct-15 (in house check Oct-16)	In house check: Oct-18
RF generator R&S SMT-06	SN: 100972	15-Jun-15 (in house check Oct-16)	In house check: Oct-18
Network Analyzer Agilent E8358A	SN: US41080477	31-Mar-14 (in house check Oct-17)	In house check: Oct-18

Calibrated by: **Manu Seitz** **Laboratory Technician**

Approved by: **Katja Pokovic** **Technical Manager**

Signature

Issued: July 16, 2018

This calibration certificate shall not be reproduced except in full without written approval of the laboratory.



Accredited by the Swiss Accreditation Service (SAS)

The Swiss Accreditation Service is one of the signatories to the EA
Multilateral Agreement for the recognition of calibration certificates

Accreditation No.: **SCS 0108**

Glossary:

TSL	tissue simulating liquid
ConvF	sensitivity in TSL / NORM x,y,z
N/A	not applicable or not measured

Calibration is Performed According to the Following Standards:

- IEEE Std 1528-2013, "IEEE Recommended Practice for Determining the Peak Spatial-Averaged Specific Absorption Rate (SAR) in the Human Head from Wireless Communications Devices: Measurement Techniques", June 2013
- IEC 62209-1, "Measurement procedure for the assessment of Specific Absorption Rate (SAR) from hand-held and body-mounted devices used next to the ear (frequency range of 300 MHz to 6 GHz)", July 2016
- IEC 62209-2, "Procedure to determine the Specific Absorption Rate (SAR) for wireless communication devices used in close proximity to the human body (frequency range of 30 MHz to 6 GHz)", March 2010
- KDB 865664, "SAR Measurement Requirements for 100 MHz to 6 GHz"

Additional Documentation:

- DASY4/5 System Handbook

Methods Applied and Interpretation of Parameters:

- Measurement Conditions:** Further details are available from the Validation Report at the end of the certificate. All figures stated in the certificate are valid at the frequency indicated.
- Antenna Parameters with TSL:** The dipole is mounted with the spacer to position its feed point exactly below the center marking of the flat phantom section, with the arms oriented parallel to the body axis.
- Feed Point Impedance and Return Loss:** These parameters are measured with the dipole positioned under the liquid filled phantom. The impedance stated is transformed from the measurement at the SMA connector to the feed point. The Return Loss ensures low reflected power. No uncertainty required.
- Electrical Delay:** One-way delay between the SMA connector and the antenna feed point. No uncertainty required.
- SAR measured:** SAR measured at the stated antenna input power.
- SAR normalized:** SAR as measured, normalized to an input power of 1 W at the antenna connector.
- SAR for nominal TSL parameters:** The measured TSL parameters are used to calculate the nominal SAR result.

The reported uncertainty of measurement is stated as the standard uncertainty of measurement multiplied by the coverage factor $k=2$, which for a normal distribution corresponds to a coverage probability of approximately 95%.

Measurement Conditions

DASY system configuration, as far as not given on page 1.

DASY Version	DASY5	V52.10.1
Extrapolation	Advanced Extrapolation	
Phantom	Modular Flat Phantom	
Distance Dipole Center - TSL	10 mm	with Spacer
Zoom Scan Resolution	dx, dy, dz = 5 mm	
Frequency	2450 MHz $\pm$ 1 MHz	

Head TSL parameters

The following parameters and calculations were applied.

	Temperature	Permittivity	Conductivity
Nominal Head TSL parameters	22.0 °C	39.2	1.80 mho/m
Measured Head TSL parameters	(22.0 $\pm$ 0.2) °C	37.8 $\pm$ 6 %	1.85 mho/m $\pm$ 6 %
Head TSL temperature change during test	< 0.5 °C	----	----

SAR result with Head TSL

SAR averaged over 1 cm³ (1 g) of Head TSL	Condition	
SAR measured	250 mW input power	13.2 W/kg
SAR for nominal Head TSL parameters	normalized to 1W	51.7 W/kg $\pm$ 17.0 % (k=2)

SAR averaged over 10 cm³ (10 g) of Head TSL	condition	
SAR measured	250 mW input power	6.15 W/kg
SAR for nominal Head TSL parameters	normalized to 1W	24.3 W/kg $\pm$ 16.5 % (k=2)

Body TSL parameters

The following parameters and calculations were applied.

	Temperature	Permittivity	Conductivity
Nominal Body TSL parameters	22.0 °C	52.7	1.95 mho/m
Measured Body TSL parameters	(22.0 $\pm$ 0.2) °C	51.9 $\pm$ 6 %	2.02 mho/m $\pm$ 6 %
Body TSL temperature change during test	< 0.5 °C	----	----

SAR result with Body TSL

SAR averaged over 1 cm³ (1 g) of Body TSL	Condition	
SAR measured	250 mW input power	13.0 W/kg
SAR for nominal Body TSL parameters	normalized to 1W	51.0 W/kg $\pm$ 17.0 % (k=2)

SAR averaged over 10 cm³ (10 g) of Body TSL	condition	
SAR measured	250 mW input power	6.06 W/kg
SAR for nominal Body TSL parameters	normalized to 1W	24.0 W/kg $\pm$ 16.5 % (k=2)

Appendix (Additional assessments outside the scope of SCS 0108)

Antenna Parameters with Head TSL

Impedance, transformed to feed point	52.9 Ω + 3.3 j Ω
Return Loss	- 27.4 dB

Antenna Parameters with Body TSL

Impedance, transformed to feed point	50.9 Ω + 5.9 j Ω
Return Loss	- 24.5 dB

General Antenna Parameters and Design

Electrical Delay (one direction)	1.156 ns
----------------------------------	----------

After long term use with 100W radiated power, only a slight warming of the dipole near the feedpoint can be measured.

The dipole is made of standard semirigid coaxial cable. The center conductor of the feeding line is directly connected to the second arm of the dipole. The antenna is therefore short-circuited for DC-signals. On some of the dipoles, small end caps are added to the dipole arms in order to improve matching when loaded according to the position as explained in the "Measurement Conditions" paragraph. The SAR data are not affected by this change. The overall dipole length is still according to the Standard.

No excessive force must be applied to the dipole arms, because they might bend or the soldered connections near the feedpoint may be damaged.

Additional EUT Data

Manufactured by	SPEAG
Manufactured on	December 11, 2008

Extended Calibration

Usage of SAR dipoles calibrated less than 3 years ago but more than 1 year ago were confirmed in maintaining return loss (<-20 dB, within 20% of prior calibration) and impedance (within 5 ohm from prior calibration) requirements per extended calibrations in KDB Publication 865664 D01 v01r04.

D2450V2 SN: 829 - Head						
Date of Measurement	Return Loss (dB)	$\Delta\%$	Impedance Real (Ω)	$\Delta\Omega$	Impedance Imaginary (j Ω)	$\Delta\Omega$
7/12/2018	-27.4		52.9		3.3	
7/13/2019	-27.9	1.8	53.4	0.5	3.7	0.4
D2450V2 SN: 829 - Body						
Date of Measurement	Return Loss (dB)	$\Delta\%$	Impedance Real (Ω)	$\Delta\Omega$	Impedance Imaginary (j Ω)	$\Delta\Omega$
7/12/2018	-24.5		50.9		5.9	
7/13/2019	-25.3	3.3	51.2	0.3	5.7	-0.2

DASY5 Validation Report for Head TSL

Date: 12.07.2018

Test Laboratory: SPEAG, Zurich, Switzerland

DUT: Dipole 2450 MHz; Type: D2450V2; Serial: D2450V2 - SN:829

Communication System: UID 0 - CW; Frequency: 2450 MHz

Medium parameters used: $f = 2450$ MHz; $\sigma = 1.85$ S/m; $\epsilon_r = 37.8$; $\rho = 1000$ kg/m³

Phantom section: Flat Section

Measurement Standard: DASY5 (IEEE/IEC/ANSI C63.19-2011)

DASY52 Configuration:

- Probe: EX3DV4 - SN7349; ConvF(7.88, 7.88, 7.88) @ 2450 MHz; Calibrated: 30.12.2017
- Sensor-Surface: 1.4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn601; Calibrated: 26.10.2017
- Phantom: Flat Phantom 5.0 (front); Type: QD 000 P50 AA; Serial: 1001
- DASY52 52.10.1(1476); SEMCAD X 14.6.11(7439)

Dipole Calibration for Head Tissue/Pin=250 mW, d=10mm/Zoom Scan (7x7x7)/Cube 0:

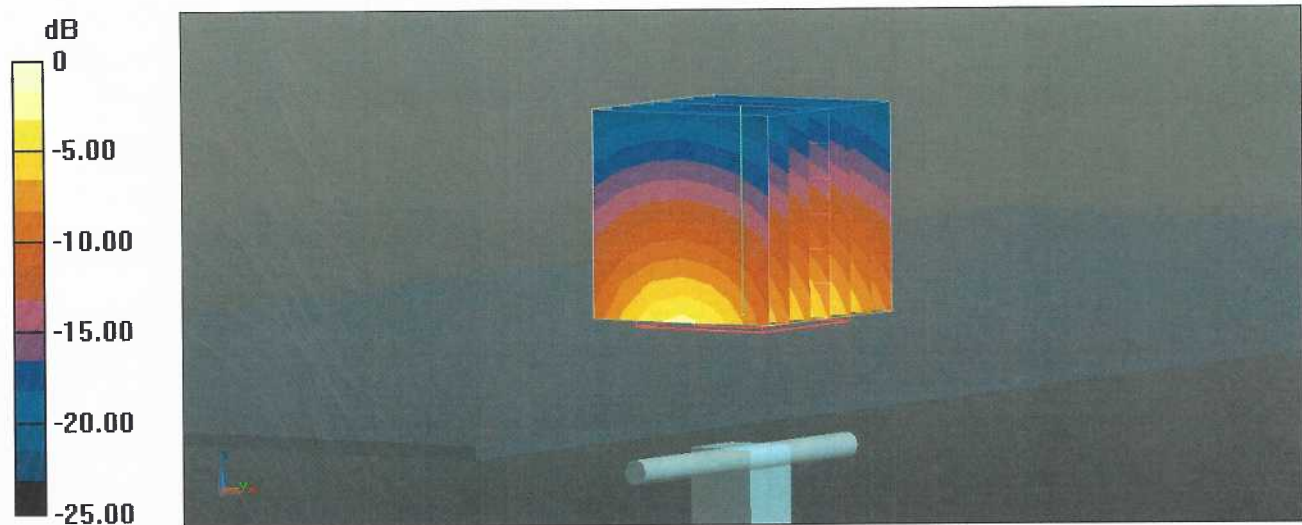
Measurement grid: dx=5mm, dy=5mm, dz=5mm

Reference Value = 116.7 V/m; Power Drift = -0.07 dB

Peak SAR (extrapolated) = 26.4 W/kg

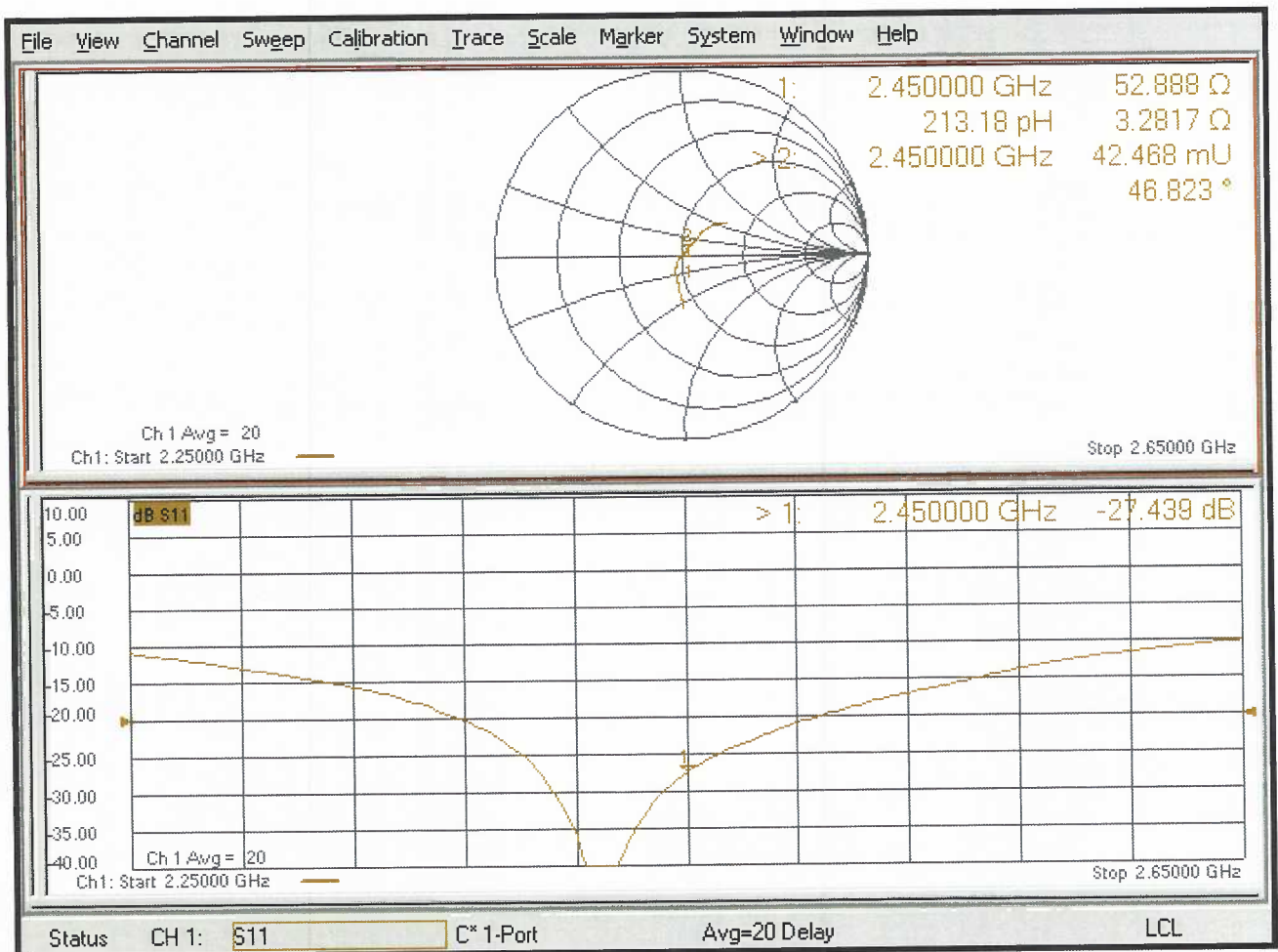
SAR(1 g) = 13.2 W/kg; SAR(10 g) = 6.15 W/kg

Maximum value of SAR (measured) = 21.9 W/kg



0 dB = 21.9 W/kg = 13.40 dBW/kg

Impedance Measurement Plot for Head TSL



DASY5 Validation Report for Body TSL

Date: 12.07.2018

Test Laboratory: SPEAG, Zurich, Switzerland

DUT: Dipole 2450 MHz; Type: D2450V2; Serial: D2450V2 - SN:829

Communication System: UID 0 - CW; Frequency: 2450 MHz

Medium parameters used: $f = 2450$ MHz; $\sigma = 2.02$ S/m; $\epsilon_r = 51.9$; $\rho = 1000$ kg/m³

Phantom section: Flat Section

Measurement Standard: DASY5 (IEEE/IEC/ANSI C63.19-2011)

DASY52 Configuration:

- Probe: EX3DV4 - SN7349; ConvF(8.01, 8.01, 8.01) @ 2450 MHz; Calibrated: 30.12.2017
- Sensor-Surface: 1.4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn601; Calibrated: 26.10.2017
- Phantom: Flat Phantom 5.0 (back); Type: QD 000 P50 AA; Serial: 1002
- DASY52 52.10.1(1476); SEMCAD X 14.6.11(7439)

Dipole Calibration for Body Tissue/Pin=250 mW, d=10mm/Zoom Scan (7x7x7)/Cube 0:

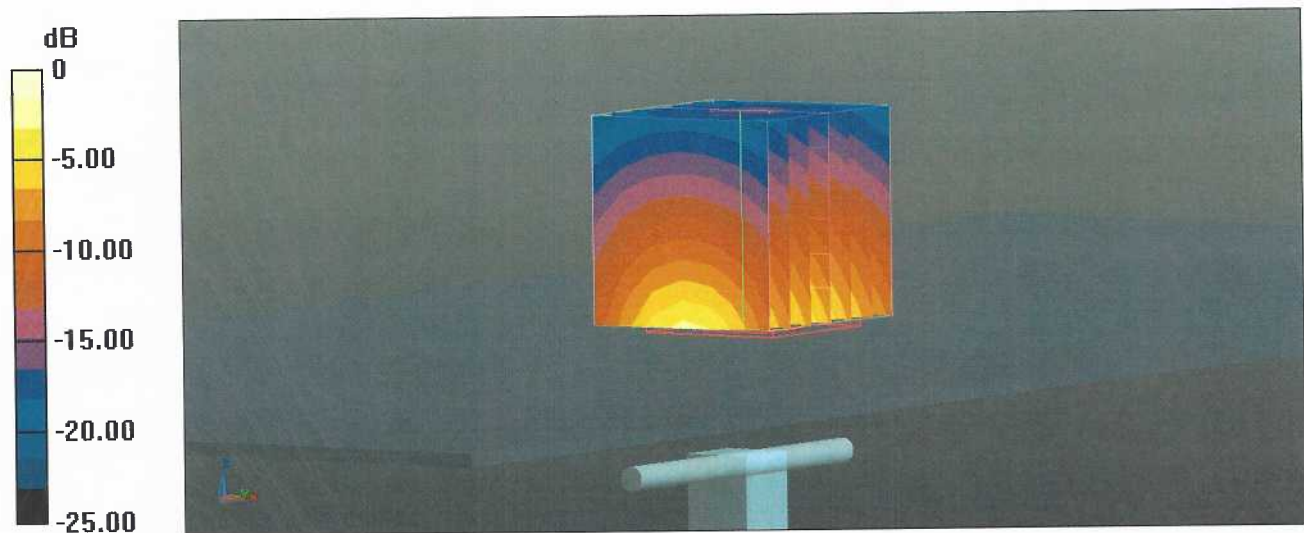
Measurement grid: dx=5mm, dy=5mm, dz=5mm

Reference Value = 107.9 V/m; Power Drift = -0.09 dB

Peak SAR (extrapolated) = 25.6 W/kg

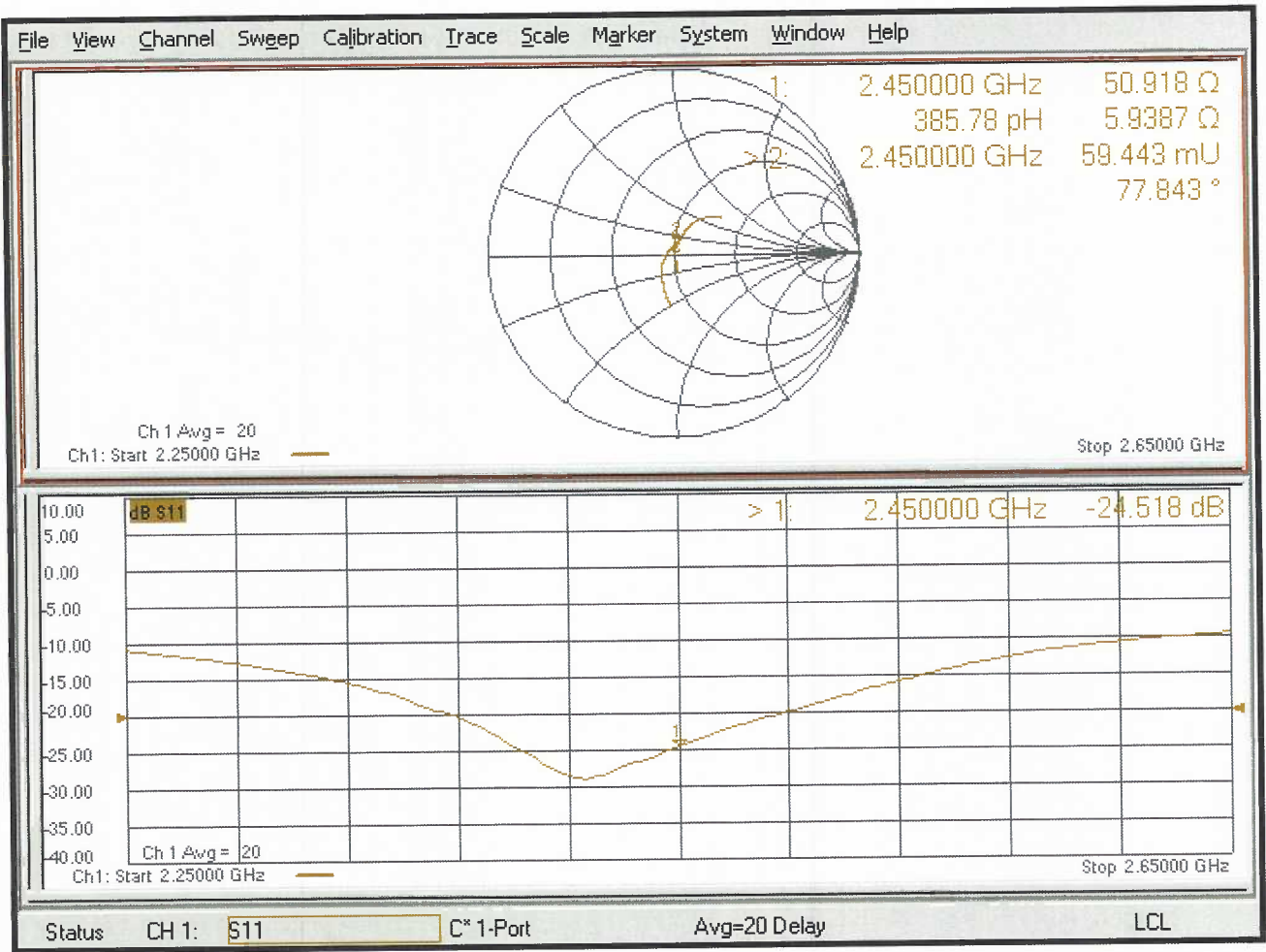
SAR(1 g) = 13 W/kg; SAR(10 g) = 6.06 W/kg

Maximum value of SAR (measured) = 21.1 W/kg



0 dB = 21.1 W/kg = 13.24 dBW/kg

Impedance Measurement Plot for Body TSL



Appendix F – Phantom Calibration Data Sheets

Certificate of Conformity / First Article Inspection

Item	Oval Flat Phantom ELI 4.0
Type No	QD OVA 001 B
Series No	1003 and higher
Manufacturer	Untersee Composites Knebelstrasse 8 CH-8268 Mannenbach, Switzerland

Tests

Complete tests were made on the prototype units QD OVA 001 AA 1001, QD OVA 001 AB 1002, pre-series units QD OVA 001 BA 1003-1005 as well as on the series units QD OVA 001 BB, 1006 ff.

Test	Requirement	Details	Units tested
Material thickness	Compliant with the standard requirements	Bottom plate: 2.0mm +/- 0.2mm	all
Material parameters	Dielectric parameters for required frequencies	< 6 GHz: Rel. permittivity = 4 +/-1, Loss tangent ≤ 0.05	Material sample
Material resistivity	The material has been tested to be compatible with the liquids defined in the standards if handled and cleaned according to the instructions.	DGBE based simulating liquids. Observe Technical Note for material compatibility.	Equivalent phantoms, Material sample
Shape	Thickness of bottom material, Internal dimensions, Sagging compatible with standards from minimum frequency	Bottom elliptical 600 x 400 mm Depth 190 mm, Shape is within tolerance for filling height up to 155 mm, Eventual sagging is reduced or eliminated by support via DUT	Prototypes, Sample testing

Standards

- [1] CENELEC EN 50361-2001, « Basic standard for the measurement of the Specific Absorption Rate related to human exposure to electromagnetic fields from mobile phones (300 MHz – 3 GHz) », July 2001
- [2] IEEE 1528-2003, "Recommended Practice for Determining the Peak Spatial-Average Specific Absorption Rate (SAR) in the Human Head from Wireless Communications Devices: Measurement Techniques, December 2003
- [3] IEC 62209 – 1, "Specific Absorption Rate (SAR) in the frequency range of 300 MHz to 3 GHz – Measurement Procedure, Part 1: Hand-held mobile wireless communication devices", February 2005
- [4] IEC 62209 – 2, Draft, "Human Exposure to Radio Frequency Fields from Handheld and Body-Mounted Wireless Communication Devices – Human models, Instrumentation and Procedures – Part 2: Procedure to determine the Specific Absorption Rate (SAR) in the head and body for 30 MHz to 6 GHz Handheld and Body-Mounted Devices used in close proximity to the Body.", February 2005
- [5] OET Bulletin 65, Supplement C, "Evaluating Compliance with FCC Guidelines for Human Exposure to Radiofrequency Electromagnetic Fields", Edition January 2001

Based on the tests above, we certify that this item is in compliance with the standards [1] to [5] if operated according to the specific requirements and considering the thickness. The dimensions are fully compliant with [4] from 30 MHz to 6 GHz. For the other standards, the minimum lower frequency limit is limited due to the dimensional requirements ([1]: 450 MHz, [2]: 300 MHz, [3]: 800 MHz, [5]: 375 MHz) and possibly further by the dimensions of the DUT.

s p e a g

Date 28.4.2008

Signature / Stamp

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Appendix G – Validation Summary

Per FCC KDB 865664 D02 v01r02, SAR system validation status should be documented to confirm measurement accuracy. The SAR systems (including SAR probes, system components and software versions) used for this device were validated against its performance specifications prior to the SAR measurements. Reference dipoles were used with the required tissue equivalent media for system validation according to the procedures outlined in FCC KDB 865664 D01 v01r04 and IEEE 1528-2013. Since SAR probe calibrations are frequency dependent, each probe calibration point was validated at a frequency within the valid frequency range of the probe calibration point using the system that normally operates with the probe for routine SAR measurements and according to the required tissue equivalent media.

A tabulated summary of the system validation status including the validation date(s), measurement frequencies, SAR probes and tissue dielectric parameters has been included.

Table G-1
SAR System Validation Summary

SAR System #	Freq. (MHz)	Date	Probe S/N	Probe Type	Probe Cal. Point		Cond. (σ)	Perm. (ε _r)	CW Validation			Modulation Validation		
									Sens-itivity	Probe Linearity	Probe Isotropy	Modulation Type	Duty Factor	PAR
2	2450	6/19/2019	7531	EX3DV4	2450	Body	1.96	52.64	Pass	Pass	Pass	OFDM/TDD	Pass	Pass