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Title: Interim SAR Test Reduction Considerations for Occupational PTT Radios

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First Category: Administrative Requirements

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Question:

What are the Specific Absorption Rate (SAR) test requirements for occupational push-to-talk (PTT) radios?

Answer:

The attached document below- [643646 D01 SAR Test for PTT Radios v01](#) - provides test reduction guidance for occupational push-to-talk (PTT) radios pending the development and publication of final procedures.

Attachment List:

[643646 D01 SAR Test for PTT Radios v01](#)

Attachment 643646 D01 SAR Test for PTT Radios v01

Interim SAR Test Reduction Considerations for Occupational PTT Radios

This document provides interim Specific Absorption Rate (SAR) test reduction guidance for occupational push-to-talk (PTT) radios pending the development and publication of final procedures. The procedures provided in the Appendix are considered based on test inquiries received from grantees and test laboratories on how to test SAR for PTT radios and associated accessories. PTT radios intended for occupational use typically have multiple options for antennas, batteries, body-worn and audio accessories. For some radios, the number of SAR test configurations introduced by large varieties of accessories can be substantial. The resulting combinations can number in the thousands.

PTT radios often require multiple antenna options to cover overlapping frequency bands or subsets of frequency bands. Multiple battery options along with a variety of body-worn accessories may be available to support different operational requirements. In some cases, a large number of different audio accessories may also be available to support law enforcement, fire and rescue or other public safety operations. In addition, some of the accessories are designed to operate only in specific combinations or configurations. When the number of possible combinations is large, there is a need to reduce the number of SAR tests to streamline the test requirements. However, it can be difficult to determine appropriate test reduction combinations for large number of accessories; whether it is based on measured SAR levels or subsets of higher exposure test configurations.

The test reduction considerations described in the Appendix can be applied to minimize some of the test concerns. When the combinations of accessories are large and complex, it is usually difficult to optimize the test reduction procedures based only on experiences and assumptions. By applying the guidance on an interim basis to test actual products and accessories for equipment certification, it will enable manufacturers, test laboratories and the FCC to identify potential issues in developing the final procedures. As issues are discovered, they will be rectified through necessary improvements to the procedures for inclusion in the final test guidance.

These test reduction considerations are recommended for testing occupational PTT radios. When SAR test reduction is applied, the Permit But Ask (PBA) process is required for a TCB to approve these radios. It is recommended that a KDB inquiry be submitted to the FCC when it is unclear if these interim procedures are applicable for testing specific product and accessory combinations to avoid unnecessary delays during equipment approval. A KDB inquiry must be submitted to seek guidance for products and circumstances where other test reduction considerations are applied or if this document is insufficient to address the SAR test concerns. The PBA procedure is not required for products with only a few accessories that do not require test reduction and all required accessory combinations have been tested.

Appendix

Note: These interim procedures are based on recent inquiries received on how to reduce the SAR tests required for PTT radios with a large number of accessory combinations. After manufacturers and test laboratories have applied these procedures to a number of PTT radios with varying accessory combinations, the experience gained will be applied to the final revision.

Head SAR Test Considerations

Passive body-worn and audio accessories generally do not apply to the head SAR of PTT radios. Head SAR is measured with the front surface of the radio at 2.5 cm parallel to a flat phantom. When the front of the radio has a contour or non-uniform surface with a variation of 1.0 cm or more, the average distance of such variations is used to establish the 2.5 cm test separation from the phantom.

1) Testing antennas with the default battery:

A) Start by testing a PTT radio with a standard battery (default battery) that is supplied with the radio to measure the head SAR of each antenna on the highest output power channel, according to the test channels required by KDB 447498 (6)(c) and in the frequency range covered by each antenna within the operating frequency bands of the radio.¹ When multiple standard batteries are supplied with a radio, the battery with the highest capacity is considered the default battery for making head SAR measurements.

I) When the head SAR of an antenna tested in A) is:

- a) ≤ 3.5 W/kg, testing of all other required channels is not necessary for that antenna
- b) > 3.5 W/kg and ≤ 4.0 W/kg, testing of the required immediately adjacent channel(s) is not necessary;² testing of the other required channels may still be required
- c) > 4.0 W/kg and ≤ 6.0 W/kg, head SAR should be measured for that antenna on the required immediately adjacent channels and testing of the other required channels still needs consideration
- d) > 6.0 W/kg, test all required channels for that antenna
- e) for the remaining channels that cannot be excluded in b) and c), which still require consideration, the 3.5 W/kg exclusion in a) and 4.0 W/kg exclusion in b) may be applied recursively with respect to the highest output power channel among the remaining channels; measure the SAR for the remaining channels that cannot be excluded
 - i) if an immediately adjacent channel measured in c) or a remaining channel measured in e) is > 6.0 W/kg, test all required channels for that antenna

2) Testing antennas with additional batteries:

¹ The test channel selection criteria in IEEE 1528-2003 may be considered when the number of channels required is greater than or equal to that required by KDB 447498 and the measured maximum output power for the closest channels between these two methods of channel selection are within $\frac{1}{2}$ dB.

² "Required immediately adjacent channels" are those defined in KDB 44749 (6)(c) next to the highest output power channel; or, if applicable, according to the channel selection criteria in IEEE 1528-2003.

- A) Based on the SAR distributions measured in 1), for antennas of the same type and construction operating within the same device frequency band, if the frequency range of an antenna (A) is fully within the frequency range of another antenna (B) and the highest SAR for antenna (A) is either ≤ 4.0 W/kg or ≤ 6.0 W/kg and it is at least 25% lower than the highest SAR measured for antenna (B)³ within the device operating frequency band, further head SAR tests with additional batteries for antenna (A) are not necessary. Justifications for antenna similarities must be clearly explained in the SAR report.
- B) When the SAR for all antennas tested using the default battery in 1)⁴ are ≤ 4.0 W/kg, test additional batteries using the antenna and channel configuration that resulted in the highest SAR among all antennas tested in 1). Testing of additional batteries in combination with the remaining antennas is unnecessary.
- I) When the SAR measured with an additional battery in B)⁵ is > 6.0 W/kg, test that additional battery on the highest SAR channel of each antenna measured in 1)⁶.
- a) if the SAR measured in I) is > 6.0 W/kg, test that additional battery and antenna combination(s) on the required immediately adjacent channels
- i) if the SAR measured in I) or a) is > 7.0 W/kg, test all required channels for the antenna and battery combination(s)
- C) When the SAR for at least one of the antennas tested in 1) with the default battery is > 4.0 W/kg:
- I) An antenna tested in 1) with highest SAR ≤ 4.0 W/kg does not need to be tested for additional batteries.⁷
- II) When the highest SAR of an antenna tested in 1) is > 4.0 W/kg and ≤ 6.0 W/kg, test additional batteries on the channel that resulted in the highest SAR for that antenna in 1).
- III) When the SAR of an antenna tested in 1) or in 2) C) II) is > 6.0 W/kg, test that battery and antenna combination on the required immediately adjacent channels
- a) if the SAR measured in III) is > 7.0 W/kg, test that battery and antenna combination on all required channels
- 3) Report the measured head SAR in formats similar to the following:

Example for Illustration Only					
Head SAR – in front of the face					
Antenna (MHz)	Measured	Ch. Freq. (MHz)	Battery		
			Default	I: Model #	II: Model #
A	Power	470.5			

³ The highest SAR is determined according to the SAR measured on the highest output power channel and all required adjacent and remaining channels. The same applies to other sections of this document.

⁴ This includes the sub-sections under 1). The same applies to other sections of this document.

⁵ This applies to items in the same section. Unless it is specifically indicated, the same applies to other sections of this document.

⁶ See footnote 3.

⁷ All SAR must be ≤ 4.0 W/kg for A) to apply. The SAR for some antennas could be ≤ 4.0 W/kg with others > 4.0 W/kg in B).

(470 – 490)	(W)	480.0			
		489.5			
	SAR (W/kg)	470.5			
		480.0			
		489.5			
B (420 – 450)	Power (W)	420.5			
		430.0			
		440.0			
		449.5			
	SAR (W/kg)	420.5			
		430.0			
		440.0			
		449.5			
C (450 – 465)	Power (W)	450.5			
		464.5			
	SAR (W/kg)	450.5			
		464.5			
D (465 – 470)	Power (W)	467.5			
	SAR (W/kg)	467.5			
Reported SAR values have already been scaled by the applicable duty factor Antenna, battery and accessory specifications are explained in the product descriptions section When test reduction applies, the slots for such configurations are left blank <i>(Note: Modify table layout to present the test results of actual product and accessories)</i>					

Body SAR Test Considerations for Body-worn Accessories

Body SAR is measured with the radio placed in a body-worn accessory, positioned against a flat phantom, representative of the normal operating conditions expected by users, without any audio accessory. Since audio accessories, including any default audio accessories supplied with a radio, may be designed to operate with a subset of the combination of antennas, batteries and body-worn accessories, to simplify the test selection sequences for audio accessories, body-worn accessories are tested without audio accessory. In general, all sides of the radio that may be positioned facing the user when using a body-worn accessory must be considered for SAR compliance. If a radio uses only one type of audio accessory and only one of the audio accessories needs to be tested because the design (operating and exposure characteristics) of these audio accessories are substantially equivalent, this particular audio accessory may be tested in conjunction with the required body-worn accessories described below. Under this circumstance, the additional audio accessory test sequences in the next sections are not required.

1) Testing antennas with the default battery and body-worn accessory:

- A) Start by testing a PTT radio with a standard battery (default battery) and a standard (default) body-worn accessory that are both supplied with the radio to measure the body SAR of each antenna on the highest output power channel, according to the test channels required by KDB 447498 (6)(c) and in the frequency range covered by each antenna within the operating frequency bands of the radio.⁸ When multiple default batteries and/or default body-worn

⁸ See footnote 1.

accessories are supplied with a radio, the thinnest standard battery with the highest capacity and the standard body-worn accessory expected to result in the highest SAR based on its construction and exposure conditions are considered the default battery and default body-worn accessory for making body-worn SAR measurements.

I) When the body SAR of an antenna tested in A) is:

- a) ≤ 3.5 W/kg, testing of all other required channels is not necessary for that antenna
- b) > 3.5 W/kg and ≤ 4.0 W/kg, testing of the required immediately adjacent channel(s) is not necessary; testing of the other required channels may still be required
- c) > 4.0 W/kg and ≤ 6.0 W/kg, body SAR should be measured for that antenna on the required immediately adjacent channels and testing of the other required channels still needs consideration
- d) > 6.0 W/kg, test all required channels for that antenna
- e) for the remaining channels that cannot be excluded in b) and c), which still require consideration, the 3.5 W/kg exclusion in a) and 4.0 W/kg exclusion in b) may be applied recursively with respect to the highest output power channel among the remaining channels; measure the SAR of the remaining channels that cannot be excluded
 - i) if an immediately adjacent channel measured in c) or a remaining channel measured in e) is > 6.0 W/kg, test all required channels for that antenna

2) Testing antennas and default body-worn accessory with additional batteries:

- A) For batteries with similar construction, test only the battery that is expected to result in the highest SAR. This is generally determined by the smallest antenna separation distance provided by the body-worn accessory, between the radio and the user, with the applicable side(s) of the radio facing the user.⁹
- B) Based on the SAR distributions measured in 1), for antennas of the same type and construction operating within the same device frequency band, if the frequency range of an antenna (A) is fully within the frequency range of another antenna (B) and the highest SAR for antenna (A) is either ≤ 4.0 W/kg or ≤ 6.0 W/kg and it is at least 25% lower than the highest SAR measured for antenna (B) within the device operating frequency band, further body SAR tests with additional batteries for antenna (A) are not necessary. Justifications for antenna similarities must be clearly explained in the SAR report.
- C) When the SAR for all antennas tested using the default battery in 1)¹⁰ is ≤ 4.0 W/kg, test additional batteries using the antenna and channel configuration that resulted in the highest SAR among all antennas tested in 1). Testing of additional batteries in combination with the default body-worn accessory and remaining antennas is unnecessary.

⁹ If a battery tested for head SAR is showing abnormally higher SAR than the other batteries, additional considerations may be necessary to determine if that battery may be excluded for body-worn SAR testing. A KDB inquiry with applicable SAR results should be submitted to make the determination.

¹⁰ See footnote 3.

- I) When the SAR measured with an additional battery in C) is > 6.0 W/kg, test that additional battery with the default body-worn accessory on the highest SAR channel for each antenna measured in 1)
 - a) if the SAR measured in I) is > 6.0 W/kg, test that additional battery and antenna combination(s) with the default body-worn accessory on the required immediately adjacent channels
 - i) if the SAR measured in I) or a) is > 7.0 W/kg, test all required channels for the configuration(s)
- D) When the SAR for at least one of the antennas tested in 1) with the default battery and body-worn accessory is > 4.0 W/kg:
 - I) An antenna tested in 1) with highest SAR ≤ 4.0 W/kg does not need to be tested for additional batteries.¹¹
 - II) When the highest SAR of an antenna tested in 1) is > 4.0 W/kg and ≤ 6.0 W/kg, test additional batteries on the channel that resulted in the highest SAR for that antenna in 1).
 - III) When the SAR of an antenna tested in 1) or in 2) D) II) is > 6.0 W/kg, test that battery and antenna combination with the default body-worn accessory on the required immediately adjacent channels
 - a) if the SAR measured in III) is > 7.0 W/kg, test that battery, antenna and body-worn accessory combination on all required channels
- 3) Report the measured body SAR in formats similar to the following for the default body-worn accessory:

¹¹ See footnote 7.

Example for Illustration Only					
Body-worn Accessory 1: <i>Model Number</i>					
Antenna (MHz)	Measured	Ch. Freq. (MHz)	Battery		
			Standard	I	II
A (470 – 490)	Power (W)	470.5			
		480.0			
		489.5			
	SAR (W/kg)	470.5			
		480.0			
		489.5			
B (420 – 450)	Power (W)	420.5			
		430.0			
		440.0			
		449.5			
	SAR (W/kg)	420.5			
		430.0			
		440.0			
		449.5			
C (450 – 465)	Power (W)	450.5			
		464.5			
	SAR (W/kg)	450.5			
		464.5			
D (465 – 470)	Power (W)	467.5			
	SAR (W/kg)	467.5			
Reported SAR values have already been scaled by the applicable duty factor Antenna, battery and accessory specifications are explained in the product descriptions section When test reduction applies, the slots for such configurations are left blank (Note: Modify table layout to present the test results of actual product and accessories)					

- 4) Repeat the above test sequence for additional body-worn accessories by replacing “default body-worn” accessory with each “additional body-worn” accessory. For body-worn accessories with similar construction and operating configurations, test only the body-worn accessory within the group that is expected to result in the highest SAR. This is typically determined by the smallest antenna separation distance provided by the body-worn accessory, between the radio and the user, with the applicable side(s) of the radio facing the user. Similarities in construction and operating configurations for batteries and body-worn accessories must be clearly explained in the SAR report.

Body SAR Test Considerations for Audio Accessories with Integral Antenna

Audio accessories with an integral antenna or radiating element must be tested separately from those without any primary radiating element. An audio accessory with a built-in antenna that enables the antenna on a PTT radio to be disconnected from its output while the audio accessory is in use should be tested using the highest capacity default battery. When transmission from the antenna on the PTT radio is disabled while the audio accessory is transmitting using its integral antenna, the normal body-worn accessories for the radio are not expected to influence the SAR of the audio accessory. In addition, special body-worn attachments are generally used with audio accessories with an integral antenna; the audio accessory must be tested according to how it is attached to the user during normal operation. Body SAR is measured with the audio accessory positioned against a flat phantom representative of the

normal operating and exposure conditions expected by users. All sides of the audio accessory that may be positioned against the user must be considered for SAR compliance.

- 1) An audio accessory is tested on the highest output power channel, according to the test channels required by KDB 447498 (6)(c) and in the frequency range covered by the antenna on the audio accessory within the operating frequency bands of the radio to measure body SAR.¹²
 - A) Based on the SAR distributions measured in 1), for audio accessories of the same type and construction operating within the same device frequency band, if the (antenna) frequency range of an audio accessory (A) is fully within the (antenna) frequency range of another audio accessory (B) and the highest SAR for accessory (A) is either ≤ 4.0 W/kg or ≤ 6.0 W/kg and it is at least 25% lower than the highest SAR measured for accessory (B) within the device operating frequency band, further body SAR tests are not necessary for audio accessory (A). Justifications for antenna similarities must be clearly explained in the SAR report.
 - B) When the body SAR of an audio accessory tested in 1) is:
 - I) ≤ 3.5 W/kg, testing of all other required channels is not necessary for that audio accessory
 - II) > 3.5 W/kg and ≤ 4.0 W/kg, testing of the required immediately adjacent channel(s) is not necessary; testing of the other required channels may still be required
 - III) > 4.0 W/kg and ≤ 6.0 W/kg, body SAR should be measured for that antenna on the required immediately adjacent channels and testing of the other required channels still needs consideration
 - IV) > 7.0 W/kg, test all required channels for that audio accessory
 - V) for the remaining channels that cannot be excluded in II) and III), which still require consideration, the 3.5 W/kg exclusion in I) and 4.0 W/kg exclusion II) may be applied recursively with respect to the highest output power channel among the remaining channels that cannot be excluded; measure the SAR for the remaining channels that cannot be excluded
 - a) if an immediately adjacent channel in III) or a remain channel measured in V) is > 7.0 W/kg, test all required channels for that audio accessory
- 2) Report the measured body SAR in formats similar to the following for the audio accessory:

¹² See footnote 1.

Example for Illustration Only			
Body SAR – audio accessories with integral antenna			
Audio Accessory (MHz)	Measured	Ch. Freq. (MHz)	SAR (W/kg)
A: <i>Model #</i> (470 – 490)	Power (W)	470.5	
		480.0	
		489.5	
	SAR (W/kg)	470.5	
		480.0	
		489.5	
B: <i>Model #</i> (450 – 465)	Power (W)	450.5	
		464.5	
	SAR (W/kg)	450.5	
		464.5	
Reported SAR values have already been scaled by the applicable duty factor Antenna, battery and accessory specifications are explained in the product descriptions section When test reduction applies, the slots for such configurations are left blank <i>(Note: Modify table layout to present the test results of actual product and accessories)</i>			

Body SAR Test Considerations for Audio Accessories without Built-in Antenna

For audio accessories that do not have any built-in radiating element, the antenna, battery and body-worn accessory combinations that are applicable to each audio accessory must be clearly identified in a format similar to the following, with the applicable combinations require testing highlighted to facilitate reviewing the results.

Example for Illustration Only												
Antenna (A – D)	Battery											
	a				b				c			
	Body-worn				Body-worn				Body-worn			
Audio Accessory	1	2	3	4	1	2	3	4	1	2	3	4
I	A, B, C, D	N/A	A, B, D	N/A	C, D	A, B, C, D	B, C	N/A	N/A	B, D	A, B, C, D	A, D
II	A, B, C, D	A, B, C, D	N/A	A, B, C, D	N/A	N/A	A, B, C, D	B, D	C	A, B, C, D	N/A	N/A
III	B, C, D	N/A	B, C, D	B, D	A, C, D	A, B, D	N/A	A, B, C, D	A, B, C, D	N/A	B, C, D	A, B, C, D
<p>In this example, audio accessories only work with the subset of antenna (A, B, C or D), battery and body-worn accessory combinations identified in the table, where N/A indicates the audio accessory (I, II or III) and/or the battery (a, b, or c) is not supported or applicable for the body-worn accessory (1, 2, 3 or 4). The antennas listed for each body-worn accessory and battery combination identify the antennas supported or applicable for that body-worn accessory.</p> <p>The possible combinations are highly dependent on the design and implementation of an individual radio and the applicable antenna and accessory combinations. The above table must be adapted accordingly for the specific product and accessory combinations in use.</p> <p>The combinations require testing should be highlighted.</p> <p><i>(Note: Modify table layout to present the test results of actual product and accessories)</i></p>												

For audio accessories with similar construction and operating requirements, test only the audio accessory within the group that is expected to result in the highest SAR, with respect to changes in RF characteristics and exposure conditions for the combination. If it is unclear which audio accessory within a group of similar accessories is expected to result in the highest SAR, good engineering judgment and preliminary testing should be applied to select the accessory that is expected to result in the highest SAR. Similarities in construction and operating configurations must be clearly explained in the SAR report.

- 1) Based on the SAR measured for the body-worn test sequences in the previous section, without audio accessory, if the highest SAR for an antenna, body-worn accessory and battery combination applicable to an audio accessory is:
 - A) ≤ 4.0 W/kg, SAR tests for that audio accessory is not necessary
 - B) > 4.0 W/kg and ≤ 7.0 W/kg test that audio accessory using the highest body-worn SAR combination and channel configuration identified in 1) that is applicable to the audio accessory. Due to the complexity of body-worn and audio accessory combinations, the applicable test combinations must be clearly described and identified in the SAR report
 - C) > 7.0 W/kg, test on all required channels for that audio accessory
 - D) When the SAR measured in B) is > 6.0 W/kg, test that audio accessory on the required immediately adjacent channels; testing of the other required channels still needs consideration
 - I) if the SAR measured in D) is > 7.0 W/kg and it is one of the accessories within a group of similar audio accessories, test all other audio accessories within that group of similar audio accessories using the highest body-worn SAR combination and channel configuration identified in 1) that is applicable to the audio accessory
 - a) when the SAR for a similar audio accessory in I) is > 7.0 W/kg, test that audio accessory on all required channels using the combination in I)
- 2) Report the measured body SAR for audio accessories in formats similar to the following

Example for Illustration Only							
Audio Accessory I: <i>Model Number</i>							
Antenna (MHz)	Measured	Ch. Freq. (MHz)	Battery (a – c) & Body-Worn (1 – 4) Combinations				
			b/2	b/4	c/1	c/2	c/3
A (470 – 490)	Power (W)	470.5					
		480.0					
		489.5					
	SAR (W/kg)	470.5					
		480.0					
		489.5					
B (420 – 450)	Power (W)	420.5					
		430.0					
		440.0					
		449.5					
	SAR (W/kg)	420.5					
		430.0					
440.0							

		449.5					
C (450 – 465)	Power (W)	450.5					
		464.5					
	SAR (W/kg)	450.5					
		464.5					
D (465 – 470)	Power (W)	467.5					
	SAR (W/kg)	467.5					
Reported SAR values have already been scaled by the applicable duty factor Antenna, battery and accessory specifications are explained in the product descriptions section When test reduction applies, the slots for such configurations are left blank <i>(Note: Modify table layout to present the test results of actual product and accessories)</i>							

General Reporting Procedures

All SAR values shall be reported as measured, with the applicable duty factor taken into consideration. Adjustments made to account for tune-up tolerances shall be considered separately, apart from the reported SAR summary results. SAR adjustments for tune-up tolerances are only needed for the highest reported SAR and SAR results that are within the tune-up tolerance range from the SAR limit to determine compliance, with respect to the power applied during testing for the individual channels and configurations.