

**FCC FOIA Control No. 2025-000263 requested by Theodora Scarato, Director Wireless and EMF Program of Environmental Health Sciences**

The FOIA request to the FCC by Theodora Scarato was for all SAR test reports (including all SAR test measurements) and documents with SAR measurements including attachments, spreadsheets, reports, regarding any cell phones or wireless devices the FCC tested themselves in their own labs or that the FCC had sent out for testing as part of their surveillance activities for the time period of January 1, 2020 through November 22, 2024.

The FCC sent 52 records in full but the documents **only showed reports on 4 models: the Motorola Model # XT2141-1 (FCC ID: IHDT56ZP1), Google LLC FCC ID A4RGE2AE (Google Pixel 7 Pro) and Qlink Wireless Scepter 8 Tablet, FCC ID 2APD4-AP15, manufactured by Hot Pepper, Inc.**

Further, the documents test results that state there was non-compliance with a 10mm separation in the Blue Grand Max.

“We conclude that the BLU GRAND MAX model mobile phone is not compliant with the technical requirements of the commission’s rules for RF Exposure under § 2.1093. The requested sample sent by the manufacturer and the models purchased were evaluated in accordance with the procedures. The sample received from the manufacturer was measured compliant, however both the purchased samples were non-compliant with SAR limits. We speculate that the model sent by the manufacturer and the sample used during FCC certification testing operated at a reduced output power as compared to the purchased samples.” Was the model taken off the market or software updated?

**TEST RESULTS**

WCDMA SAR was tested under RMC 12.2kbps with HSPA inactive. Per KDB Publication 941225 D01v03r01, HSPA SAR was not required since the average output power of the HSPA subtests was not more than 0.25dB higher than the RMC level and SAR was less than 1.2W/kg.

Sample Serial Number: 1030021018103495							
Measurement Number	Wireless Technology	Frequency Band	Channel	Wireless Mode	Test Position	Test Separation Distance (mm)	SAR – 1g (W/kg)
1	WCDMA	Band IV	1762	RMC, 12.2 Kbps, Hotspot	Bottom Edge	10	0.564
2	WCDMA	Band IV	1762	RMC, 12.2 Kbps, Hotspot	Bottom Edge	10	0.561
Sample Serial Number: 1070021017083663							
1	WCDMA	Band IV	1762	RMC, 12.2 Kbps, Hotspot	Bottom Edge	10	1.73
2	WCDMA	Band IV	1762	RMC, 12.2 Kbps, Hotspot	Bottom Edge	10	1.72
Sample Serial Number: 1070021017085090							
1	WCDMA	Band IV	1762	RMC, 12.2 Kbps, Hotspot	Bottom Edge	10	2.02
1	WCDMA	Band IV	1762	RMC, 12.2 Kbps, Hotspot	Bottom Edge	10	2.02

Contact Theodora Scarato for internal documents. [Theodora@ehsciences.org](mailto:Theodora@ehsciences.org)



Federal Communications Commission  
Washington, D.C. 20554

August 28, 2025

VIA ELECTRONIC MAIL

Theodora Scarato  
10604 Trotters Trail  
Potomac, MD 20854  
[theodorams@gmail.com](mailto:theodorams@gmail.com)

RE: FOIA Control No. 2025-000263

Dear Ms. Scarato,

This is in reply to the Freedom of Information Act (FOIA) request you submitted to the Federal Communications Commission (FCC or Commission) on November 5, 2024. You request “all SAR test reports (including all SAR test measurements) and documents with SAR measurements including attachments, spreadsheets, reports, regarding any cell phones or wireless devices the FCC tested themselves in their own labs or that the FCC had sent out for testing as part of their surveillance activities for the time period of January 1, 2020 through November 22, 2024.”<sup>1</sup>

Your request was assigned FOIA Control No. 2025-000263 and referred to the Office of Engineering and Technology (OET). OET conducted a search and found 52 records responsive to your request. We are providing 52 records in full with this letter.

We are required by both the FOIA and the Commission’s rules to charge requesters certain fees associated with the costs of searching for, reviewing, and duplicating the sought-after information.<sup>2</sup> To calculate the appropriate fee, requesters are classified as: (1) commercial use requesters; (2) educational requesters, non-commercial scientific organizations, or representatives of the news media; or (3) all other requesters.<sup>3</sup>

Pursuant to section 0.466(a)(5)-(7) of the Commission’s rules, you have been classified as category (2), “educational requesters, non-commercial scientific organizations, or representatives of the news media.”<sup>4</sup> As an “educational requester, non-commercial scientific organization, or representative of the news media,” the Commission assesses charges to recover the cost of reproducing the records requested, excluding the cost of reproducing the first 100 pages. The production in response to your request was provided in electronic form. Therefore, you will not be charged any fees.

If you consider this to be a denial of your FOIA request, you may seek review by filing an application for review with the Office of General Counsel. An application for review must be *received* by the Commission within 90 calendar days of the date of this letter.<sup>5</sup> You may file an application for review by

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<sup>1</sup> FOIA Control No. 2025-000263 (submitted Nov. 22, 2024).

<sup>2</sup> See 5 U.S.C. § 552(a)(4)(A); 47 CFR § 0.470.

<sup>3</sup> 47 CFR § 0.470.

<sup>4</sup> 47 CFR § 0.466(a)(5)-(7).

<sup>5</sup> 47 CFR §§ 0.461(j), 1.7 (documents are considered filed with the Commission upon their receipt at the location designated by the Commission).

mailing the application to Federal Communications Commission, Office of General Counsel, 45 L Street NE, Washington, DC 20554, or you may file your application for review electronically by e-mailing it to [FOIA-Appeal@fcc.gov](mailto:FOIA-Appeal@fcc.gov). Please caption the envelope (or subject line, if via e-mail) and the application itself as “Review of Freedom of Information Action.”

If you would like to discuss this response before filing an application for review to attempt to resolve your dispute without going through the appeals process, you may contact the Commission’s FOIA Public Liaison for assistance at:

FOIA Public Liaison  
Federal Communications Commission  
Office of the Managing Director  
Performance Evaluation and Records Management  
45 L Street NE, Washington, DC 20554  
202-418-0440  
[FOIA-Public-Liaison@fcc.gov](mailto:FOIA-Public-Liaison@fcc.gov)

If you are unable to resolve your FOIA dispute through the Commission’s FOIA Public Liaison, the Office of Government Information Services (OGIS), the Federal FOIA Ombudsman’s office, offers mediation services to help resolve disputes between FOIA requesters and Federal agencies. The contact information for OGIS is:

Office of Government Information Services  
National Archives and Records Administration  
8601 Adelphi Road–OGIS  
College Park, MD 20740-6001  
202-741-5770  
877-684-6448  
[ogis@nara.gov](mailto:ogis@nara.gov)  
<https://www.archives.gov/ogis>

Sincerely,



Andrew C. Hendrickson  
Chief  
Office of Engineering & Technology

cc: FOIA Office

Attachments