

# RF Exposure Evaluation Report

**APPLICANT** : VINFAST TRADING AND PRODUCTION  
JOINT STOCK COMPANY

**EQUIPMENT** : MULTIMEDIA HEAD UNIT

**BRAND NAME** : VINFAST

**MODEL NAME** : VF-EC22U

**FCC ID** : 2A6HEVF-EC22U

**STANDARD** : 47 CFR Part 2.1091

The product evaluation date was started from Aug. 16, 2022 and completed on Aug. 16, 2022. We, Sporton International Inc. (Kunshan), would like to declare that the device has been evaluated in accordance with 47 CFR Part 2.1091/47 CFR Part 1.1307, and pass the limit. Without written approval of Sporton International Inc. (Kunshan), the test report shall not be reproduced except in full.



Approved by: Si Zhang



***Sporton International Inc. (Kunshan)***

***No. 1098, Pengxi North Road, Kunshan Economic Development Zone Jiangsu Province 215300  
People's Republic of China***



## **Table of Contents**

|                                                                                |           |
|--------------------------------------------------------------------------------|-----------|
| <b>1. ADMINISTRATION DATA .....</b>                                            | <b>4</b>  |
| 1.1. Testing Laboratory .....                                                  | 4         |
| <b>2. GUIDANCE APPLIED .....</b>                                               | <b>4</b>  |
| <b>3. DESCRIPTION OF EQUIPMENT UNDER TEST (EUT) .....</b>                      | <b>5</b>  |
| <b>4. MAXIMUM RF AVERAGE OUTPUT TUNE UP POWER AMONG PRODUCTION UNITS .....</b> | <b>6</b>  |
| <b>5. RF EXPOSURE LIMIT INTRODUCTION .....</b>                                 | <b>8</b>  |
| <b>6. RADIO FREQUENCY RADIATION EXPOSURE EVALUATION .....</b>                  | <b>10</b> |
| 6.1. Standalone assessment .....                                               | 10        |
| 6.2. Simultaneous Transmission MPE Test Exemption .....                        | 11        |



**Revision History**

| REPORT NO. | VERSION | DESCRIPTION              | ISSUED DATE   |
|------------|---------|--------------------------|---------------|
| FA233104   | Rev. 01 | Initial issue of report. | Sep. 07, 2022 |
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## **1. Administration Data**

### **1.1. Testing Laboratory**

Sporton International Inc. (Kunshan) is accredited to ISO/IEC 17025:2017 by American Association for Laboratory Accreditation with Certificate Number 5145.02.

| Testing Laboratory |                                                                                                                                                                          |                     |                                |
|--------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------|--------------------------------|
| Test Firm          | Sporton International Inc. (Kunshan)                                                                                                                                     |                     |                                |
| Test Site Location | No. 1098, Pengxi North Road, Kunshan Economic Development Zone<br>Jiangsu Province 215300 People's Republic of China<br>TEL : +86-512-57900158<br>FAX : +86-512-57900958 |                     |                                |
| Test Site No.      | Sporton Site No.                                                                                                                                                         | FCC Designation No. | FCC Test Firm Registration No. |
|                    | SAR01-KS                                                                                                                                                                 | CN1257              | 314309                         |

| Applicant    |                                                                                                          |
|--------------|----------------------------------------------------------------------------------------------------------|
| Company Name | VINFAST TRADING AND PRODUCTION JOINT STOCK COMPANY                                                       |
| Address      | Dinh Vu - Cat Hai Economic Zone, Cat Hai Island, Cat Hai Town, Cat Hai District, Hai Phong City, Vietnam |

| Manufacturer |                                                                                                          |
|--------------|----------------------------------------------------------------------------------------------------------|
| Company Name | VINFAST TRADING AND PRODUCTION JOINT STOCK COMPANY                                                       |
| Address      | Dinh Vu - Cat Hai Economic Zone, Cat Hai Island, Cat Hai Town, Cat Hai District, Hai Phong City, Vietnam |

## **2. Guidance Applied**

According to the specifications of the manufacturer, the EUT must comply with the requirements of the following standards:

- FCC 47 CFR Part 2.1091
- KDB 447498 D04 Interim General RF Exposure Guidance v01
- FCC 47 CFR Part 1.1307



### 3. Description of Equipment Under Test (EUT)

| Product Feature & Specification         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|-----------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| EUT Type                                | MULTIMEDIA HEAD UNIT                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| Brand Name                              | VINFAST                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| Model Name                              | VF-EC22U                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| FCC ID                                  | 2A6HEVF-EC22U                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| Wireless Technology and Frequency Range | GSM850: 824 MHz ~ 849 MHz<br>GSM1900: 1850 MHz ~ 1910 MHz<br>WCDMA Band II: 1850 MHz ~ 1910 MHz<br>WCDMA Band IV: 1710 MHz ~ 1755 MHz<br>WCDMA Band V: 824 MHz ~ 849 MHz<br>LTE Band 2 : 1850 MHz ~ 1910 MHz<br>LTE Band 4 : 1710 MHz ~ 1755 MHz<br>LTE Band 5 : 824 MHz ~ 849 MHz<br>LTE Band 7: 2500 MHz ~ 2570 MHz<br>LTE Band 12 : 699 MHz ~ 716 MHz<br>LTE Band 13 : 777 MHz ~ 787 MHz<br>WLAN 2.4GHz Band: 2412 MHz ~ 2462 MHz<br>WLAN 5.2GHz Band: 5180 MHz ~ 5240 MHz<br>WLAN 5.8GHz Band: 5745 MHz ~ 5825 MHz<br>Bluetooth: 2402 MHz ~ 2480 MHz |
| Mode                                    | GPRS/EGPRS<br>RMC 12.2Kbps<br>HSDPA<br>HSUPA<br>HSPA+(16QAM uplink is supported)<br>LTE: QPSK, 16QAM<br>WLAN 2.4GHz 802.11b/g/n HT20<br>WLAN 5GHz 802.11a/n HT20/HT40<br>WLAN 5GHz 802.11ac VHT20/VHT40/VHT80<br>Bluetooth BR/EDR/LE                                                                                                                                                                                                                                                                                                                     |
| Antenna Gain                            | GSM850 : 0.7 dBi<br>GSM1900 : 2.1 dBi<br>WCDMA Band II: 2.1 dBi<br>WCDMA Band IV: 3.5 dBi<br>WCDMA Band V: 0.7 dBi<br>LTE Band 2 : 2.1 dBi<br>LTE Band 4 : 3.5 dBi<br>LTE Band 5 : 0.7 dBi<br>LTE Band 7 : -1.7 dBi<br>LTE Band 12 : 1.8 dBi<br>LTE Band 13 : 0.1 dBi<br>WLAN2.4GHz: 3.264 dBi<br>Bluetooth: 2.402 dBi<br>WLAN5.2GHz: 1.305 dBi<br>WLAN5.8GHz: 2.685 dBi                                                                                                                                                                                 |
| Antenna Type                            | WWAN: Fixed External Antenna<br>WLAN/Bluetooth: Fixed Internal Antenna                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| HW Version                              | C2.2                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| SW Version                              | SOW30005092                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| EUT Stage                               | Identical Prototype                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |

**Remark:** The above EUT's information was declared by manufacturer. Please refer to the specifications or user's manual for more detailed description.

#### Comments and Explanations:

1. The declared of product specification for EUT presented in the report are provided by the manufacturer, and the manufacturer takes all the responsibilities for the accuracy of product specification.
2. The maximum RF output tune up power, antenna gain also the safe distance used for evaluate RF exposure were declared by manufacturer.

#### **4. Maximum RF average output tune up power among production units**

##### **<GSM>**

| Mode                    | Burst average power(dBm) |          |
|-------------------------|--------------------------|----------|
|                         | GSM 850                  | GSM 1900 |
| GPRS (GMSK, 1 Tx slot)  | 34.00                    | 30.50    |
| GPRS (GMSK, 2 Tx slots) | 32.50                    | 30.50    |
| GPRS (GMSK, 3 Tx slots) | 30.50                    | 29.00    |
| GPRS (GMSK, 4 Tx slots) | 30.00                    | 28.00    |
| EDGE (8PSK, 1 Tx slot)  | 28.00                    | 27.00    |
| EDGE (8PSK, 2 Tx slots) | 27.00                    | 26.50    |
| EDGE (8PSK, 3 Tx slots) | 25.50                    | 25.00    |
| EDGE (8PSK, 4 Tx slots) | 24.50                    | 24.00    |

##### **<WCDMA>**

| Mode  |         | Maximum Average power(dBm) |
|-------|---------|----------------------------|
| WCDMA | Band II | 24.50                      |
|       | Band IV | 24.50                      |
|       | Band II | 24.50                      |

##### **<LTE>**

| Mode |         | Maximum Average power(dBm) |
|------|---------|----------------------------|
| LTE  | Band 2  | 24.00                      |
|      | Band 4  | 24.50                      |
|      | Band 5  | 24.50                      |
|      | Band 7  | 24.00                      |
|      | Band 12 | 24.00                      |
|      | Band 13 | 24.00                      |

##### **<2.4GHz WLAN >**

| Frequency   | Mode         | Maximum Average Power (dBm) |
|-------------|--------------|-----------------------------|
| WLAN 2.4GHz | 802.11b      | 16.00                       |
|             | 802.11g      | 13.00                       |
|             | 802.11n-HT20 | 12.00                       |

##### **<Bluetooth>**

| Mode      |        | Maximum Average power(dBm) |
|-----------|--------|----------------------------|
| Bluetooth | BR/EDR | 1.00                       |



|  |    |      |
|--|----|------|
|  | LE | 1.00 |
|--|----|------|

**<5GHz WLAN >**

| Frequency   | Mode           | Maximum Average Power (dBm) |
|-------------|----------------|-----------------------------|
| WLAN 5.2GHz | 802.11a        | 11.00                       |
|             | 802.11n-HT20   | 11.00                       |
|             | 802.11n-HT40   | 9.00                        |
|             | 802.11ac-VHT20 | 11.00                       |
|             | 802.11ac-VHT40 | 9.00                        |
|             | 802.11ac-VHT80 | 8.00                        |
| WLAN 5.8GHz | 802.11a        | 11.00                       |
|             | 802.11n-HT20   | 11.00                       |
|             | 802.11n-HT40   | 9.00                        |
|             | 802.11ac-VHT20 | 11.00                       |
|             | 802.11ac-VHT40 | 9.00                        |
|             | 802.11ac-VHT80 | 8.00                        |

## 5. RF Exposure Limit Introduction

1. Per 1.1307(b)(3), (i) For single RF sources (i.e., any single fixed RF source, mobile device, or portable device, as defined in paragraph (b)(2) of this section): A single RF source is exempt if:
  - (A) The available maximum time-averaged power is no more than 1 mW, regardless of separation distance. This exemption may not be used in conjunction with other exemption criteria other than those in paragraph (b)(3)(ii)(A) of this section. Medical implant devices may only use this exemption and that in paragraph (b)(3)(ii)(A);
  - (B) Or the available maximum time-averaged power or effective radiated power (ERP), whichever is greater, is less than or equal to the threshold P<sub>th</sub> (mW) described in the following formula. This method shall only be used at separation distances (cm) from 0.5 centimeters to 40 centimeters and at frequencies from 0.3 GHz to 6 GHz (inclusive). P<sub>th</sub> is given by:

$$P_{th} \text{ (mW)} = \begin{cases} ERP_{20 \text{ cm}} (d/20 \text{ cm})^x & d \leq 20 \text{ cm} \\ ERP_{20 \text{ cm}} & 20 \text{ cm} < d \leq 40 \text{ cm} \end{cases} \quad [1]$$

$$\text{Where } x = -\log_{10}\left(\frac{60}{ERP_{20 \text{ cm}} \sqrt{f}}\right) \text{ and } f \text{ is in GHz} \quad [2]$$

$$\text{and } ERP_{20 \text{ cm}} \text{ (mW)} = \begin{cases} 2040f & 0.3 \text{ GHz} < f \leq 1.5 \text{ GHz} \\ 3060 & 1.5 \text{ GHz} < f \leq 6 \text{ GHz} \end{cases} \quad [3]$$

- (C) Or using Table 1 and the minimum separation distance (R in meters) from the body of a nearby person for the frequency (f in MHz) at which the source operates, the ERP (watts) is no more than the calculated value prescribed for that frequency. For the exemption in Table 1 to apply, R must be at least  $\lambda/2\pi$ , where  $\lambda$  is the free-space operating wavelength in meters. If the ERP of a single RF source is not easily obtained, then the available maximum time-averaged power may be used in lieu of ERP if the physical dimensions of the radiating structure(s) do not exceed the electrical length of  $\lambda/4$  or if the antenna gain is less than that of a half-wave dipole (1.64 linear value)

Table 1 to § 1.1307(b)(3)(i)(C) - Single RF Sources Subject to Routine Environmental Evaluation

| RF Source frequency (MHz) | Threshold ERP (watts) |
|---------------------------|-----------------------|
| 0.3-1.34                  | $1,920 R^2$           |
| 1.34-30                   | $3,450 R^2 / f^2$     |
| 30-300                    | $3.83 R^2$            |
| 300-1,500                 | $0.0128 R^2 f$        |
| 1,500-100,000             | $19.2 R^2$            |



2. For multiple RF sources: Multiple RF sources are exempt if:

- (A) The available maximum time-averaged power of each source is no more than 1 mW and there is a separation distance of two centimeters between any portion of a radiating structure operating and the nearest portion of any other radiating structure in the same device, except if the sum of multiple sources is less than 1 mW during the time-averaging period, in which case they may be treated as a single source (separation is not required). This exemption may not be used in conjunction with other exemption criteria other than those in paragraph (b)(3)(i)(A) of this section. Medical implant devices may only use this exemption and that in paragraph (b)(3)(i)(A).
- (B) In the case of fixed RF sources operating in the same time-averaging period, or of multiple mobile or portable RF sources within a device operating in the same time averaging period, if the sum of the fractional contributions to the applicable thresholds is less than or equal to 1 as indicated in the following equation.

$$\sum_{i=1}^a \frac{P_i}{P_{th,i}} + \sum_{j=1}^b \frac{ERP_j}{ERP_{th,j}} + \sum_{k=1}^c \frac{Evaluated_k}{Exposure Limit_k} \leq 1$$

- a. a = number of fixed, mobile, or portable RF sources claiming exemption using the § 1.1307(b)(3)(i)(B) formula for  $P_{th}$ , including existing exempt transmitters and those being added.
- b. b = number of fixed, mobile, or portable RF sources claiming exemption using the applicable § 1.1307(b)(3)(i)(C) Table 1 formula for Threshold ERP, including existing exempt transmitters and those being added.
- c. c = number of existing fixed, mobile, or portable RF sources with known evaluation for the specified minimum distance.
- d.  $P_i$ , the available maximum time-averaged power or the ERP, whichever is greater, for fixed, mobile, or portable RF source  $i$  at a distance between 0.5 cm and 40 cm (inclusive)
- e.  $P_{th,i}$  the exemption threshold power ( $P_{th}$ ) according to the § 1.1307(b)(3)(i)(B) formula for fixed, mobile, or portable RF source  $i$ .
- f.  $ERP_j$  the available maximum time-averaged power or the ERP, whichever is greater, of fixed, mobile, or portable RF source  $j$ .
- g.  $ERP_{th,j}$  exemption threshold ERP for fixed, mobile, or portable RF source  $j$ , at a distance of at least  $\lambda/2\pi$ , according to the applicable § 1.1307(b)(3)(i)(C) Table 1 formula at the location in question.
- h.  $Evaluated_k$  the maximum reported SAR or MPE of fixed, mobile, or portable RF source  $k$  either in the device or at the transmitter site from an existing evaluation.
- i.  $Exposure Limit_k$  either the general population/uncontrolled maximum permissible exposure (MPE) or specific absorption rate (SAR) limit for each fixed, mobile, or portable sources RF source  $k$ , as applicable from § 1.1310 of this chapter.
- j. *The relationship between EIRP and ERP is:  $ERP (dBm) = EIRP - 2.15$ , Where EIRP is the sum of the conducted power (dBm) and the antenna gain (dBi)*

The sum of the ratios of the applicable terms for SAR-based, MPE-based and measured SAR or MPE shall be less than 1, to determine simultaneous transmission exposure compliance



## 6. Radio Frequency Radiation Exposure Evaluation

### 6.1. Standalone assessment

| Band                    | Antenna Gain (dBi) | Maximum Conducted Power (dBm) | Maximum EIRP (dBm) | Maximum ERP (dBm) | Maximum ERP (mW) | Separation Distance (cm) | Part1.1307 option(b) Threshold (mW) | Part1.1307 option(b) P/Pth |
|-------------------------|--------------------|-------------------------------|--------------------|-------------------|------------------|--------------------------|-------------------------------------|----------------------------|
| GPRS 850 (1 Tx slot)    | 0.70               | 34.00                         | 25.70              | 23.55             | 226.46           | 20                       | 1681.368                            | 0.188                      |
| GPRS 850 (2 Tx slots)   | 0.70               | 32.50                         | 27.20              | 25.05             | 319.89           | 20                       | 1681.368                            | 0.266                      |
| GPRS 850 (3 Tx slots)   | 0.70               | 30.50                         | 26.94              | 24.79             | 301.30           | 20                       | 1681.368                            | 0.250                      |
| GPRS 850 (4 Tx slots)   | 0.70               | 30.00                         | 27.70              | 25.55             | 358.92           | 20                       | 1681.368                            | 0.298                      |
| EGPRS 850 (1 Tx slot)   | 0.70               | 28.00                         | 19.70              | 17.55             | 56.89            | 20                       | 1681.368                            | 0.047                      |
| EGPRS 850 (2 Tx slots)  | 0.70               | 27.00                         | 21.70              | 19.55             | 90.16            | 20                       | 1681.368                            | 0.075                      |
| EGPRS 850 (3 Tx slots)  | 0.70               | 25.50                         | 21.94              | 19.79             | 95.28            | 20                       | 1681.368                            | 0.079                      |
| EGPRS 850 (4 Tx slots)  | 0.70               | 24.50                         | 22.20              | 20.05             | 101.16           | 20                       | 1681.368                            | 0.084                      |
| GPRS 1900 (1 Tx slot)   | 2.10               | 30.50                         | 23.60              | 21.45             | 139.64           | 20                       | 3060.000                            | 0.046                      |
| GPRS 1900 (2 Tx slots)  | 2.10               | 30.50                         | 26.60              | 24.45             | 278.61           | 20                       | 3060.000                            | 0.092                      |
| GPRS 1900 (3 Tx slots)  | 2.10               | 29.00                         | 26.84              | 24.69             | 294.44           | 20                       | 3060.000                            | 0.097                      |
| GPRS 1900 (4 Tx slots)  | 2.10               | 28.00                         | 27.10              | 24.95             | 312.61           | 20                       | 3060.000                            | 0.103                      |
| EGPRS 1900 (1 Tx slot)  | 2.10               | 27.00                         | 20.10              | 17.95             | 62.37            | 20                       | 3060.000                            | 0.021                      |
| EGPRS 1900 (2 Tx slots) | 2.10               | 26.50                         | 22.60              | 20.45             | 110.92           | 20                       | 3060.000                            | 0.037                      |
| EGPRS 1900 (3 Tx slots) | 2.10               | 25.00                         | 22.84              | 20.69             | 117.22           | 20                       | 3060.000                            | 0.039                      |
| EGPRS 1900 (4 Tx slots) | 2.10               | 24.00                         | 23.10              | 20.95             | 124.45           | 20                       | 3060.000                            | 0.041                      |
| WCDMA Band 2            | 2.10               | 24.50                         | 26.60              | 24.45             | 278.61           | 20                       | 3060.000                            | 0.092                      |
| WCDMA Band 4            | 3.50               | 24.50                         | 28.00              | 25.85             | 384.59           | 20                       | 3060.000                            | 0.126                      |
| WCDMA Band 5            | 0.70               | 24.50                         | 25.20              | 23.05             | 201.84           | 20                       | 1680.960                            | 0.168                      |
| LTE Band 2              | 2.10               | 24.00                         | 26.10              | 23.95             | 248.31           | 20                       | 3060.000                            | 0.082                      |
| LTE Band 4              | 3.50               | 24.50                         | 28.00              | 25.85             | 384.59           | 20                       | 3060.000                            | 0.126                      |
| LTE Band 5              | 0.70               | 24.50                         | 25.20              | 23.05             | 201.84           | 20                       | 1680.960                            | 0.168                      |
| LTE Band 7              | -1.70              | 24.00                         | 22.30              | 20.15             | 103.51           | 20                       | 3060.000                            | 0.082                      |
| LTE Band 12             | 1.80               | 24.00                         | 25.80              | 23.65             | 231.74           | 20                       | 1425.960                            | 0.176                      |
| LTE Band 13             | 0.10               | 24.00                         | 24.10              | 21.95             | 156.68           | 20                       | 1585.080                            | 0.158                      |
| 2.4GHz WLAN             | 3.264              | 16.00                         | 19.26              | 17.11             | 51.45            | 20                       | 3060.000                            | 0.017                      |
| 5.2GHz WLAN             | 1.305              | 11.00                         | 12.31              | 10.16             | 10.36            | 20                       | 3060.000                            | 0.004                      |
| 5.8GHz WLAN             | 2.685              | 11.00                         | 13.69              | 11.54             | 14.24            | 20                       | 3060.000                            | 0.005                      |
| Bluetooth               | 2.402              | 1.00                          | 3.40               | 1.25              | 1.33             | 20                       | 3060.000                            | 0.0004                     |

**6.2. Simultaneous Transmission MPE Test Exemption**

| WWAN P/Pth Ratio | Bluetooth P/Pth Ratio | WLAN 2.4GHz P/Pth Ratio | Sum of the Ratio<br>WWAN + Bluetooth + WLAN 2.4GHz |
|------------------|-----------------------|-------------------------|----------------------------------------------------|
| 0.298            | 0.0004                | 0.017                   | 0.315                                              |
| WWAN P/Pth Ratio | Bluetooth P/Pth Ratio | WLAN 5GHz P/Pth Ratio   | Sum of the Ratio<br>WWAN + Bluetooth + WLAN 5GHz   |
| 0.298            | 0.0004                | 0.005                   | 0.303                                              |

**Note:**

1. According to Part1.1307 (b)(3)(i)(B), the P/Pth Ratio is using for Sim-Tx analysis, above table was showing summation ratio is smaller than 1.

**Conclusion:**

According to 47 CFR §1.1307 (b)(3)(i)(B), the RF exposure analysis concludes that the RF Exposure is FCC compliant.

-----THE END-----