

RF EXPOSURE EVALUATION REPORT

Application No.: GZCR2210001391AT
Applicant: Dongguan Siyoto Electronics Co., Ltd.
Address of Applicant: No.10 North 7th street, Qiaodong road, Qiaotou town, Dongguan, Guangdong, China
Manufacturer: Dongguan Siyoto Electronics Co., Ltd.
Address of Manufacturer: No.10 North 7th street, Qiaodong road, Qiaotou town, Dongguan, Guangdong, China
Factory: Dongguan Siyoto Electronics Co., Ltd.
Address of Factory: No.10 North 7th street, Qiaodong road, Qiaotou town, Dongguan, Guangdong, China
Equipment Under Test (EUT):
EUT Name: WIRELESS HEADPHONES
Model No.: HA-A7T2, HA-Z77T ♣
♣ Please refer to section 2 of this report which indicates which item was actually tested and which were electrically identical.
Trade Mark: JVC
Standard(s) : FCC Rules 47 CFR §2.1093
Date of Receipt: 2022-11-02
Date of Evaluation: 2022-11-22
Date of Issue: 2023-01-12

Evaluation Result:	Pass*
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* In the configuration evaluated, the EUT complied with the standards specified above.



Ricky Liu
Manager

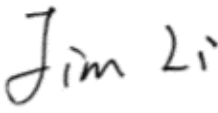
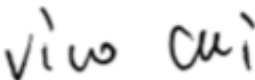


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SGS-CSTC Standards Technical Services Co., Ltd. No.198 Kexhu Road, Sciencetech Park, Guangzhou Economic & Technology Development District, Guangzhou, China 510663 t (86-20) 82155555 f (86-20) 82075058 www.sgsgroup.com.cn
Guangzhou Branch Testing & Calibration Laboratory 中国·广州·经济技术开发区科学城科珠路198号 邮编: 510663 t (86-20) 82155555 f (86-20) 82075058 sgs.china@sgs.com

Revision Record			
Version	Report No.	Date	Remark
01	GZCR221000139103	2023-01-12	Original

Authorized for issue by			
			
		<u>Jim Li/Project Engineer</u>	
			
		<u>Vico Cui/Reviewer</u>	



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2 Evaluation Summary

Item	Standard	Method	Requirement	Result
RF Exposure	FCC Rules 47 CFR §2.1093	FCC Rules 47 CFR §2.1093	FCC Rules 47 CFR §2.1093	Pass

Note:

E.U.T./EUT means Equipment Under Test.

Pass means the test result passed the test standard requirement, please find the detailed decision rule in the report relative section.

♣ Declaration of EUT Family Grouping:

Model No.: HA-A7T2, HA-Z77T

According to the declaration from the applicant, the electrical circuit design, layout, components used and internal wiring were identical for all models, with only difference on appearance decoration, color and model number.

Therefore, only one model HA-A7T2 was tested in this report.

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SGS-CSTC Standards Technical Services Co., Ltd.
Guangzhou Branch Testing Center EEC Laboratory

No.198 Kezhu Road, Sciotech Park, Guangzhou Economic & Technology Development District, Guangzhou, China 510663 t (86-20) 82155555 f (86-20) 82075058 www.sgsgroup.com.cn
中国·广州·经济技术开发区科学城科珠路198号 邮编: 510663 t (86-20) 82155555 f (86-20) 82075058 sgs.china@sgs.com

4 General Information

4.1 Details of E.U.T.

Power supply: DC 3.7V powered by built-in battery as below for normal working:
Li-ion VDL 1033S1
Rated: DC 3.7V, 40mAh.
DC 5 V for charging.

Cable(s): For earphone:
DC input ports.
For charger:
DC output port.
USB to Type-C charging port with unshielded cable(0.25m)

Operation Frequency: 2402MHz to 2480MHz
Modulation Type: GFSK, pi/4DQPSK, 8DPSK
Number of Channels: 79
Channel Spacing: 1MHz
Spectrum Spread Technology: Frequency Hopping Spread Spectrum(FHSS)

Antenna Type: FPC Antenna
Antenna Gain: -3.45 dBi declared by applicant for left earbud.
-0.57 dBi declared by applicant for right earbud.

4.2 Evaluating Location

All tests were performed at:

SGS-CSTC Standards Technical Services Co., Ltd., Guangzhou Branch EMC Laboratory,
198 Kezhu Road, Sciencetech Park, Guangzhou Economic & Technology Development District,
Guangzhou, China 510663

Tel: +86 20 82155555 Fax: +86 20 82075059

No tests were sub-contracted.



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Guangzhou Branch EMC Laboratory

No. 198 Kezhu Road, Sciencetech Park, Guangzhou Economic & Technology Development District, Guangzhou, China 510663 t (86-20) 82155555 f (86-20) 82075058 www.sgsgroup.com.cn
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4.3 Facility

The facility is recognized, certified, or accredited by the following organizations:

● ACMA

SGS-CSTC Standards Technical Services Co., Ltd., EMC Laboratory can also perform testing for the Australian/New Zealand Regulatory Compliance Mark (RCM).

● SGS UK(Certificate No.: 32), SGS-TUV SAARLAND and SGS-FIMKO

Have approved SGS-CSTC Standards Technical Services Co., Ltd., EMC Laboratory as a supplier of EMC TESTING SERVICES and SAFETY TESTING SERVICES.

● FCC Recognized Accredited Test Firm(Registration No.: 486818)

SGS-CSTC Standards Technical Services Co., Ltd., EMC Laboratory has been accredited and fully described in a report filed with the (FCC) Federal Communications Commission. The acceptance letter from the FCC is maintained in our files. Designation Number: CN5016, Test Firm Registration Number: 486818.

● ISED (Registration No.: 4620B, CAB identifier: CN0052)

SGS-CSTC Standards Technical Services Co., Ltd., has been registered by Innovation Science and Economic Development Canada for Wireless Device Testing laboratories to test to Canadian radio equipment requirements. Registration No. 4620B, CAB identifier: CN0052.

● VCCI (Registration No.: R-12460, C-12584, G-20107 and T-11179)

The 10m Semi-anechoic chamber, 966 Anechoic Chamber and Shielded Room of SGS-CSTC Standards Technical Services Co., Ltd. have been registered in accordance with the Regulations for Voluntary Control Measures with Registration No.: R-12460, C-12584, G-20107 and T-11179 respectively.

● CBTL (Lab Code: TL129)

SGS-CSTC Standards Technical Services Co., Ltd., E&E Laboratory has been assessed and fully comply with the requirements of ISO/IEC 17025:2017, the Basic Rules, IECEE 01 and Rules of procedure IECEE 02, and the relevant IECEE CB-Scheme Operational documents.

4.4 Deviation from Standards

None

4.5 Abnormalities from Standard Conditions

None



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5 FCC Radiofrequency radiation exposure limit.

5.1 Blanket 1 mW Blanket Exemption

The 1 mW Blanket Exemption of §1.1307(b)(3)(i)(A) applies for single fixed, mobile, and portable RF sources with available maximum time-averaged power of no more than 1 mW, regardless of separation distance.

The 1-mW blanket exemption applies at separation distances less than 0.5 cm, including where there is no separation. This exemption shall not be used in conjunction with other exemption criteria other than those for multiple RF sources in paragraph §1.1307(b)(3)(ii)(A).

The 1-mW exemption is independent of service type and covers the full range of 100 kHz to 100 GHz, but it shall not be used in conjunction with other exemption criteria or in devices with higher-power transmitters operating in the same time-averaging period. Exposure from such higher-power transmitters would invalidate the underlying assumption that exposure from the lower-power transmitter is the only contributor to SAR in the relevant volume of tissue.

5.2 MPE-based Exemption

General frequency and separation-distance dependent MPE-based effective radiated power (ERP) thresholds are in Table B.1 [Table 1 of §1.1307(b)(1)(i)(C)] to support an exemption from further evaluation from 300 kHz through 100 GHz.

Table B.1—Thresholds For Single RF Sources Subject to Routine Environmental Evaluation

RF Source Frequency			Minimum Distance			Threshold ERP
f_L MHz		f_H MHz	$\lambda_L / 2\pi$		$\lambda_H / 2\pi$	W
0.3	—	1.34	159 m	—	35.6 m	1,920 R ²
1.34	—	30	35.6 m	—	1.6 m	3,450 R ² /f ²
30	—	300	1.6 m	—	159 mm	3.83 R ²
300	—	1,500	159 mm	—	31.8 mm	0.0128 R ² f
1,500	—	100,000	31.8 mm	—	0.5 mm	19.2R ²

Subscripts L and H are low and high; λ is wavelength.

From §1.1307(b)(3)(i)(C), modified by adding Minimum Distance columns.

The table applies to any RF source (i.e. single fixed, mobile, and portable transmitters) and specifies power and distance criteria for each of the five frequency ranges used for the MPE limits. These criteria apply at separation distances from any part of the radiating structure of at least $\lambda/2\pi$. The thresholds are based on the general population MPE limits with a single perfect reflection, outside of the reactive near-field, and in the main beam of the radiator.

For mobile devices that are not exempt per Table B.1 [Table 1 of §1.1307(b)(1)(i)(C)] at distances from 20 cm to 40 cm and in 0.3 GHz to 6 GHz, evaluation of compliance with the exposure limits in §1.1310 is necessary

if the ERP of the device is greater than ERP_{20cm} in Formula (B.1) [repeated from §2.1091(c)(1); also in §1.1307(b)(1)(i)(B)].

$$P_{th} \text{ (mW)} = ERP_{20 \text{ cm}} \text{ (mW)} = \begin{cases} 2040f & 0.3 \text{ GHz} \leq f < 1.5 \text{ GHz} \\ 3060 & 1.5 \text{ GHz} \leq f \leq 6 \text{ GHz} \end{cases} \quad (\text{B.1})$$

If the ERP is not easily obtained, then the available maximum time-averaged power may be used (i.e., without consideration of ERP only 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.

SAR-based exemptions are constant at separation distances between 20 cm and 40 cm to avoid discontinuities in the threshold when transitioning between SAR-based and MPE-based exemption criteria at 40 cm, considering the importance of reflections.

Limit calculation			
Frequency range	Frequency(MHz)	$R(\lambda/2\pi)(m)$	Threshold ERP(W)
300~1500MHz	915	0.0522	0.032
1500~100000MHz	2480	0.0193	0.007

5.3 SAR-based Exemption

SAR-based thresholds are derived based on frequency, power, and separation distance of the RF source. The formula defines the thresholds in general for either available maximum time-averaged power or maximum time-averaged ERP, whichever is greater.

If the ERP of a device is not easily determined, such as for a portable device with a small form factor, the applicant may use the available maximum time-averaged power exclusively if the device antenna or radiating structure does not exceed an electrical length of $\lambda/4$.

As for devices with antennas of length greater than $\lambda/4$ where the gain is not well defined, but always less than that of a half-wave dipole (length $\lambda/2$), the available maximum time-averaged power generated by the device may be used in place of the maximum time-averaged ERP, where that value is not known.

The separation distance is the smallest distance from any part of the antenna or radiating structure for all persons, during operation at the applicable ERP. In the case of mobile or portable devices, the separation distance is from the outer housing of the device where it is closest to the antenna.

The SAR-based exemption formula of §1.1307(b)(3)(i)(B), repeated here as Formula (B.2), applies for single fixed, mobile, and portable RF sources with available maximum time-averaged power or effective radiated power (ERP), whichever is greater, of less than or equal to the threshold P_{th} (mW).

This method shall only be used at separation distances from 0.5 cm to 40 cm and at frequencies from 0.3 GHz to 6 GHz (inclusive). P_{th} is given by Formula (B.2).



$$P_{th} \text{ (mW)} = \begin{cases} ERP_{20 \text{ cm}}(d/20 \text{ cm})^x & d \leq 20 \text{ cm} \\ ERP_{20 \text{ cm}} & 20 \text{ cm} < d \leq 40 \text{ cm} \end{cases} \quad (\text{B. 2})$$

where

$$x = -\log_{10} \left(\frac{60}{ERP_{20 \text{ cm}} \sqrt{f}} \right)$$

and f is in GHz, d is the separation distance (cm), and $ERP_{20 \text{ cm}}$ is per Formula (B.1).

Example values shown in Table B.2 are for illustration only.

Table B.2—Example Power Thresholds (mW)

Frequency (MHz)	Distance(mm)									
	5	10	15	20	25	30	35	40	45	50
300	39	65	88	110	129	148	166	184	201	217
450	22	44	67	89	112	135	158	180	203	226
835	9	25	44	66	90	116	145	175	207	240
1900	3	12	26	44	66	92	122	157	195	236
2450	3	10	22	38	59	83	111	143	179	219
3600	2	8	18	32	49	71	96	125	158	195
5800	1	6	14	25	40	58	80	106	136	169

Limit calculation				
Frequency range(GHz)	Frequency(GHz)	X	Distance(cm)	Pth (mW)
0.3~1.5	0.915	1.474	0.5	8.133
1.5~6	2.48	1.905	0.5	2.717

6 Measurement and Calculation

6.1 Maximum transmit power

Test Channel	Maximum Peak Conducted Output Power (dBm) (Left earbud)	Maximum Peak Conducted Output Power (dBm) (Right earbud)
2402	0.37	1.63
2441	0.94	2.51
2480	1.37	3.00

Refer to report No. GZCR221000139102 for EUT test Max Conducted Peak Output Power value.

6.2 RF Exposure Calculation

The Max Conducted Peak Output Power is 1.371 mW for left earbud & 1.995 mW for right earbud.

The best case gain of the antenna is -3.58 dBi for left earbud & -0.57 for right earbud.

-3.58 dBi logarithmic terms convert to numeric result is nearly 0.439.

-0.57 dBi logarithmic terms convert to numeric result is nearly 0.877.

According to the formula B.1 & B.2. Calculate EIRP test results:

$EIRP = P \times G = 1.371 \text{ mW} \times 0.439 = 0.602 \text{ mW} (-2.204 \text{ dBm})$ for left earbud.

$EIRP = P \times G = 1.995 \text{ mW} \times 0.877 = 1.749 \text{ mW} (2.482 \text{ dBm})$ for right earbud.

$ERP = EIRP - 2.15 = -2.204 - 2.15 = -4.354 \text{ dBm} (0.367 \text{ mW})$ for left earbud.

$ERP = EIRP - 2.15 = 2.482 - 2.15 = 0.332 \text{ dBm} (1.079 \text{ mW})$ for right earbud.

For left earbud.

	Evaluation method	Exempt Limit(mW)	Verdict
☒	Blanket 1 mW Blanket Exemption	1mW	Yes
☐	MPE-based Exemption (ERP)	7mW	N/A
☐	SAR-based Exemption (P_{th})	2.717 mW	N/A

For right earbud.

	Evaluation method	Exempt Limit(mW)	Verdict
☐	Blanket 1 mW Blanket Exemption	1mW	N/A
☒	MPE-based Exemption (ERP)	7mW	Yes
☒	SAR-based Exemption (P_{th})	2.717 mW	Yes

For both earbuds are transmitting at the same time, $0.367/2.717 + 1.079/2.717 = 0.5322 < 1$.

So, the SAR report is not required.



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7 EUT Constructional Details (EUT Photos)

Refer to External and Internal Photos for GZCR2210001391AT

- End of the Report -



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