

1 Cover Page

RF Exposure Evaluation Report

Application No.: SHCR2207001545AT
FCC ID: 2AH25LD010
IC: 22621-LD010
Applicant: Shanghai Sunmi Technology Co.,Ltd.
Address of Applicant: Room 505, No.388 Song Hu Road, Yang Pu District, Shanghai, China
Manufacturer: Shanghai Sunmi Technology Co.,Ltd.
Address of Manufacturer: Room 505, No.388 Song Hu Road, Yang Pu District, Shanghai, China
Equipment Under Test (EUT):
EUT Name: Multifunction Base
Model No.: LD010
Trade Mark: 
Standard(s) : FCC Rules 47 CFR §2.1091
KDB 447498 D04 interim General RF Exposure Guidance v01
RSS-102 Issue 5 Amendment 1 (February 2, 2021)
Date of Receipt: 2022-07-26
Date of Test: 2022-08-05 to 2022-08-15
Date of Issue: 2022-08-15

Test Result:	Pass*
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* In the configuration tested, the EUT complied with the standards specified above.

Parlan Zhan

Parlan Zhan
Laboratory Manager



<i>Revision Record</i>				
<i>Version</i>	<i>Chapter</i>	<i>Date</i>	<i>Modifier</i>	<i>Remark</i>
01		2022-08-15		Original

Authorized for issue by:			
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3 General Information

3.1 General Description of E.U.T.

Power supply:	DC 5V,2A by adapter
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3.2 Technical Specifications

2.4G

Operation Frequency:	802.11b/g/n(HT20): 2412MHz to 2462MHz;802.11n(HT40): 2422MHz to 2452MHz
Modulation Type:	802.11b: DSSS (CCK, DQPSK, DBPSK);802.11g/n: OFDM (64QAM, 16QAM, QPSK, BPSK)
Number of Channels:	802.11b/g/n(HT20):11;802.11n(HT40):7
Channel Spacing:	5MHz
Antenna Type:	PIFA Antenna
Antenna Gain:	Ant1: 1.70dBi(Provided by the manufacturer) Ant2: 2.77dBi(Provided by the manufacturer) Directional gain:5.26dBi



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3.3 Test Location

All tests were performed at:

Compliance Certification Services (Kunshan) Inc.

No.10 Weiye Rd, Innovation Park, Eco&Tec, Development Zone, Kunshan City, Jiangsu, China.

Tel: +86 512 5735 5888 Fax: +86 512 5737 0818

No tests were sub-contracted.

Note:

1.SGS is not responsible for wrong test results due to incorrect information (e.g., max. internal working frequency, antenna gain, cable loss, etc) is provided by the applicant. (If applicable).

2.SGS is not responsible for the authenticity, integrity and the validity of the conclusion based on results of the data provided by applicant. (If applicable).

3.4 Test Facility

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

• **CNAS (No. CNAS L4354)**

CNAS has accredited Compliance Certification Services (Kunshan) Inc. to ISO/IEC 17025:2017 General Requirements for the Competence of Testing and Calibration Laboratories (CNAS-CL01 Accreditation Criteria for the Competence of Testing and Calibration Laboratories) for the competence in the field of testing.

• **A2LA (Certificate No. 2541.01)**

Compliance Certification Services (Kunshan) Inc. is accredited by the American Association for Laboratory Accreditation (A2LA). Certificate No. 2541.01.

• **FCC (Designation Number: CN1172)**

Compliance Certification Services Inc. has been recognized as an accredited testing laboratory. Designation Number: CN1172.

• **ISED (CAB Identifier: CN0072)**

Compliance Certification Services (Kunshan) Inc. has been recognized by Innovation, Science and Economic Development (ISED) Canada as an accredited testing laboratory.

CAB Identifier: 2324E

• **VCCI (Member No.: 1938)**

The 3m and 10m Semi-anechoic chamber and Shielded Room of Compliance Certification Services (Kunshan) Inc. has been registered in accordance with the Regulations for Voluntary Control Measures with Registration No.: R-20134, R-11600, C-11707, T-11499, G-10216 respectively.



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4 FCC Radiofrequency radiation exposure limits

Test exemptions apply for devices used in general population/uncontrolled exposure environments, according to the SAR-based, or MPE-based exemption thresholds.

4.1 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.

4.2 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.



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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
1500~10000MHz	2462	0.0194	0.007

4.3 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 $\lambda/4$.



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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).



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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)
1.5~6	2.462	1.903	20	3060.000



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5 Test Standards and Limits

5.1 IC Radiofrequency radiation exposure limits:

According to RSS-102 section 2.5.2, RF exposure evaluation is required if the separation distance between the user and/or bystander and the device's radiating element is greater than 20 cm, except when the device operates as follows:

below 20 MHz and the source-based, time-averaged maximum e.i.r.p. of the device is equal to or less than 1 W (adjusted for tune-up tolerance);

- at or above 20 MHz and below 48 MHz and the source-based, time-averaged maximum e.i.r.p. of the device is equal to or less than $4.49/f^{0.5}$ W (adjusted for tune-up tolerance), where f is in MHz;
- at or above 48 MHz and below 300 MHz and the source-based, time-averaged maximum e.i.r.p. of the device is equal to or less than 0.6 W (adjusted for tune-up tolerance);
- at or above 300 MHz and below 6 GHz and the source-based, time-averaged maximum e.i.r.p. of the device is equal to or less than $1.31 \times 10^{-2} f^{0.6834}$ W (adjusted for tune-up tolerance), where f is in MHz;
- at or above 6 GHz and the source-based, time-averaged maximum e.i.r.p. of the device is equal to or less than 5 W (adjusted for tune-up tolerance).

For 2.4G device, the limit of worse case is 2.68 W



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6 Measurement and Calculation

6.1 Maximum transmit power

The Power Data is based on the RF Test Report SHCR220700154501

Test Mode	Channel	Antenna 1 Power[dBm]	Antenna 2 Power[dBm]	MIMO Power[dBm]	Antenna 1 Power[mW]	Antenna 2 Power[mW]	MIMO Power[mW]
11B	2412	13.36	13.55	NA	21.68	22.65	N/A
11B	2437	13.60	13.55	NA	22.91	22.65	N/A
11B	2462	13.46	13.36	NA	22.18	21.68	N/A
11G	2412	12.92	12.58	NA	19.59	18.11	N/A
11G	2437	12.74	12.75	NA	18.79	18.84	N/A
11G	2462	12.58	12.66	NA	18.11	18.45	N/A
11N20MIMO	2412	12.61	12.84	15.74	18.24	19.23	37.50
11N20MIMO	2437	12.79	12.66	15.74	19.01	18.45	37.50
11N20MIMO	2462	12.67	12.55	15.62	18.49	17.99	36.48
11N40MIMO	2422	11.94	11.81	14.89	15.63	15.17	30.83
11N40MIMO	2437	11.79	11.79	14.80	15.10	15.10	30.20
11N40MIMO	2452	11.78	11.83	14.82	15.07	15.24	30.34



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6.2 RF Exposure Calculation

For FCC

2.4G:

The Max Conducted Peak Output Power is 22.91 mW for antenna1, 22.65 mW for antenna2. The best case gain of the antenna is 1.70dBi for antenna1 and 2.77dBi for antenna2.

1.70dBi logarithmic terms convert to numeric result is nearly 1.48.

2.77dBi logarithmic terms convert to numeric result is nearly 1.89.

5.26dBi logarithmic terms convert to numeric result is nearly 3.36.

According to the formula. calculate the EIRP test result:

Antenna1: $EIRP = P \times G = 22.91 \text{ mW} \times 1.48 = 33.91 \text{ mW}$

Antenna2: $EIRP = P \times G = 22.65 \text{ mW} \times 1.89 = 42.81 \text{ mW}$

In MIMO mode: $EIRP = P \times G = 37.50 \text{ mW} \times 3.36 = 126 \text{ mW}$

Remark: we used the maximum power between the conducted power and ERP/EIRP to perform RF exposure exemption evaluation.

	Evaluation method	Exempt Limit(mW)	Verdict
<input type="checkbox"/>	Blanket 1 mW Blanket Exemption	1mW	N/A
<input type="checkbox"/>	MPE-based Exemption(ERP)	7mW(ERP) (2.4GHz Band)	N/A
<input checked="" type="checkbox"/>	SAR-based Exemption(P_{th})	3060mW(ERP) (1.5GHz~6GHz)	Yes

So, the device is to qualify for SAR test exemption, the exemption report is in lieu of the SAR report

For IC:

2.4GHz WiFi SISO mode:

Antenna 1: $E.I.R.P. = P \times G = 0.02291 \times 1.48 = 0.034 \text{ W} < 2.68 \text{ W}$

Antenna 2: $E.I.R.P. = P \times G = 0.02265 \times 1.89 = 0.0428 \text{ W} < 2.68 \text{ W}$

So the device is exclusion from SAR test.

--End of the Report--



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