

Report No.: SHCR230400079103

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Cover Page

RF Exposure Evaluation Report

SHCR2304000791ME Application No.: FCC ID: 2AK34-STEMI305CAM IC: 21444-STEMI305CAM Applicant: Carl Zeiss Suzhou Co., Ltd.

Address of Applicant: Modern Industrial Square 3-B, NO. 333, Xing Pu Road, SIP, 215216,

Suzhou, China

Carl Zeiss Suzhou Co., Ltd. Manufacturer:

Modern Industrial Square 3-B, NO. 333, Xing Pu Road, SIP, 215216, **Address of Manufacturer:**

Suzhou, China

Carl Zeiss Suzhou Co., Ltd. **Factory:**

Address of Factory: Modern Industrial Square 3-B, NO. 333, Xing Pu Road, SIP, 215216,

Equipment Under Test (EUT):

Stereo microscope **EUT Name:** Stemi 305 cam W body Model No.:

Trade Mark:

FCC Rules 47 CFR §2.1093 Standard(s):

KDB 447498 D04 interim General RF Exposure Guidance v01

RSS-102 Issue 6 (December 15, 2023)

2023-04-21 **Date of Receipt:**

2023-05-07 to 2023-06-03 **Date of Test:**

2024-01-15 Date of Issue:

Pass* **Test Result:**

Parlam Zhan



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^{*} In the configuration tested, the EUT complied with the standards specified above.



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Revision Record							
Version Description Date Remark							
00	Original	2024-01-15	/				

Authorized for issue by:		
	Wade Thang	
	Wade Zhang/Project Engineer	
	Parlam Zhan	
	Parlam Zhan /Reviewer	



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General Information 3

General Description of E.U.T.

Power supply:	DC 5V 2A Max from microscope stand.	
S/N:	3948100001	
Firmware Version:	V1.0.15	
	□ Portable device	
Product Type:	☐ Mobile device	
	☐ Fixed device	

3.2 Details of E.U.T.

2.4GHz WiFi

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:	Antenna 1: FPC Antenna Antenna 2: FPC Antenna
Antenna Gain:	Antenna 1: 3.40dBi Antenna 2: 3.40dBi (Provided by manufacturer) Directional gain: 6.41dBi
Antenna Number:	2
Date Rate:	802.11b:1/2/5.5./11Mbps 802.11g:6/9/12/18/24/36/48/54Mbps 802.11n:MCS0-MCS7

5GHz WiFi

JGHZ WIFI					
Operation Frequency:	Band	Mode	Frequency	Number of	
			Range(MHz)	channels	
	UNII Band I	802.11a/n(HT20)/ac(HT20)	5180-5240	4	
		802.11n(HT40)/ac(HT40)	5190-5230	2	
		802.11ac(HT80)	5210	1	
Modulation Type:	802.11a: OFDM	(64QAM, 16QAM, QPSK, BPSK)		
	802.11n: OFDM	(BPSK, QPSK, 16QAM, 64QAM)		
	802.11ac: OFDM	(BPSK, QPSK, 16QAM, 64QAM	M, 256QAM)		
Date Rate:	802.11a:6/9/12/1	8/24/36/48/54Mbps			
	802.11n:MCS0-N	ICS7			
	802.11ac:VHT MCS0-MCS7				
Channel Spacing:	802.11a/n(HT20)/ac(HT20): 20MHz				
	802.11n(HT40)/ac(HT40): 40MHz				
	802.11ac(HT80):	: 80MHz			



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Antenna Type:	Antenna 1: FPC Antenna
Antenna Type.	Antenna 2: FPC Antenna
	Antenna 1: 4.89dBi
Antenna Gain:	Antenna 2: 4.89dBi
Antenna Gam.	(Provided by manufacturer)
	Directional gain: 7.9dBi
Antenna Number:	2
TPC Function:	Without TPC function

3.3 **Separation Distance**

Separation distance between the antenna to person (R): 4cm(Antenna 1); 9cm(Antenna 2)

Remark: This minimum test separation distance is determined by the smallest distance from the antenna and radiating structures or outer surface of the device, according to the host form factor, exposure conditions and platform requirements, to any part of the body or extremity of a user or bystander.



The Antenna 1&2 Location



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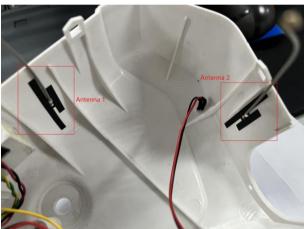
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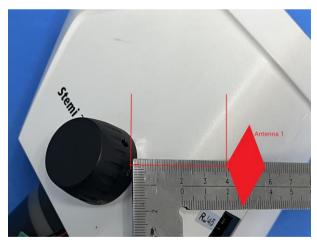












Distance closest to the Head

Distance closest to the Hand

Antenna Location



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3.4 Test Location

All tests were performed at:

SGS-CSTC Standards Technical Services (Shanghai) Co., Ltd.

588 West Jindu Road, Xinqiao, Songjiang, 201612 Shanghai, China.

Tel: +86 21 6191 5666

Fax: +86 21 6191 5678

No tests were sub-contracted.

Note:

- 1. SGS is not responsible for wrong test results due to incorrect information (e.g. max. clock frequency, highest internal 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).

3.5 Test Facility

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

• A2LA (Certificate No. 6332.01)

SGS-CSTC Standards Technical Services (Shanghai) Co., Ltd. is accredited by the American Association for Laboratory Accreditation(A2LA).

• FCC (Designation Number: CN1301)

SGS-CSTC Standards Technical Services (Shanghai) Co., Ltd. has been recognized as an accredited testing laboratory.

• ISED (CAB Identifier: CN0020)

SGS-CSTC Standards Technical Services (Shanghai) Co., Ltd. EMC Laboratory has been recognized by Innovation, Science and Economic Development Canada (ISED) as an accredited testing laboratory.

Company Number: 8617A VCCI (Member No.: 3061)

The 3m Semi-anechoic chamber and Shielded Room of SGS-CSTC Standards Technical Services (Shanghai) Co., Ltd. has been registered in accordance with the Regulations for Voluntary Control Measures with Registration No.: R-13868, C-14336, T-12221, G-10830 respectively.



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FCC Radiofrequency radiation exposure limits 4

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

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.

Medical implant devices may only use this exemption and that in paragraph (b)(3)(ii)(A);

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. 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 λ 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).



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

RF Source Frequency			Minimum Distance			Threshold ERP
f∟ MHz		f _H MHz	λ∟ / 2π	λ _L / 2π		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 R2/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. R:Separation distance between the antenna to person

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 nearfield, and in the main beam of the radiator.

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 λ/4 where the gain is not well defined, but always less than that of a half-wave dipole (length λ/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 Pth (mW).

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



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

where

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

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

Limit calculation						
Frequency range(GHz)	Frequency(GHz)	X	d(cm)	Pth (mW)		
1.5~6	2.462	1.903	4	143.032		
1.5~6	2.462	1.903	9	669.438		
1.5~6	5.24	2.067	4	109.846		
1.5~6	5.24	2.067	9	587.259		

RF Exposure Test Exemptions for Simultaneous Transmission

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 is paragraph (b)(3)(i)(A) of this section. Medical implant devices may only use this exemption and that in paragraph (b)(3)(i)(A).

Either SAR-based or MPE-based exemption may be considered for test exemption for fixed, mobile, or portable device exposure conditions; therefore, the contributions from each exemption in conjunction with the measured SAR (Evaluatedk term) shall be used to determine exemption for simultaneous transmission. 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.

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

Where:

a = number of fixed, mobile, or portable RF sources claiming exemption using paragraph (b)(3)(i)(B) of this section for Pth, including existing exempt transmitters and those being added.



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b = number of fixed, mobile, or portable RF sources claiming exemption using paragraph (b)(3)(i)(C) of this section for Threshold ERP, including existing exempt transmitters and those being added.

c = number of existing fixed, mobile, or portable RF sources with known evaluation for the specified minimum distance including existing evaluated transmitters.

Pi = 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).

Pth, i = the exemption threshold power (Pth) according to paragraph (b)(3)(i)(B) of this section for fixed, mobile, or portable RF source i.

ERPj = the ERP of fixed, mobile, or portable RF source j.

ERPth, j = exemption threshold ERP for fixed, mobile, or portable RF source <math>j, at a distance of at least λ /2 \pi according to the applicable formula of paragraph (b)(3)(i)(C) of this section.

Evaluatedk = 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 at the location of exposure.

Exposure Limitk = either the general population/uncontrolled maximum permissible exposure (MPE) or specific absorption rate (SAR) limit for each fixed, mobile, or portable RF source k, as applicable from § 1.1310 of this chapter.

5 IC Radiofrequency radiation exposure limits:

According to RSS-102 issue 6 section 6.3, devices operating at or below the applicable output power levels (adjusted for tune-up tolerance) specified in table 1, based on the separation distance, are exempt from SAR evaluation. The separation distance, defined as the distance between the user and/or bystander and the antenna and/or radiating element of the device or the outer surface of the device, shall be less than or equal to 20 cm for these exemption limits to apply.

Table 1: Power limits for exemption from routine SAR evaluation based on the separation distance

MHz	5	10	15	20	25	30	35	40	45	>50	mm
≤300	45	116	139	163	189	216	246	280	319	362	
450	32	71	87	104	124	147	175	208	248	296	
835	21	32	41	54	72	96	129	172	228	298	
1900	6	10	18	33	57	92	138	194	257	323	mW
2450	3	7	16	32	56	89	128	170	209	245	
3500	2	6	15	29	50	72	94	114	134	158	
5800	1	5	13	23	32	41	54	74	102	128	

The exemption limits in table 1 Table 1 are based on measurements and simulations of half-wave dipole antennas at separation distances of 5 mm to 50 mm from a flat phantom, which provides a SAR value of



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approximately 0.4 W/kg for 1 g of tissue. For limb-worn devices where the 10 gram of tissue applies, the exemption limits for routine evaluation in table 1 are multiplied by a factor of 2.5. For controlled-use devices where the 8 W/kg for 1 gram of tissue applies, the exemption limits for routine evaluation in table 1 are multiplied by a factor of 5.

When the operating frequency of the device is between two frequencies located in table 1, linear interpolation shall be applied for the applicable separation distance. If the separation distance of the device is between two distances located in table 1, linear interpolation may be applied for the applicable frequency. Alternatively, the limit corresponding to the smaller distance may be employed. For example, in case of a 7 mm separation distance, either use the exception value for a 5 mm separation distance or interpolate between the limits corresponding to 5 mm and 10 mm separation distances.

For implanted medical devices, the exemption limit for routine SAR evaluation is set at an output power of 1 mW, regardless of frequency.

The practical use condition for this device is as a portable device. So the applicable limit is 10g extremity SAR for antenna 1 and 1g extremity SAR for antenna 2.

For WIFI 2.4G@4cm (Antenna 1), the limit is Pmax≤170mW*2.5=425mW

For WIFI 2.4G@9cm (Antenna 2), the limit is Pmax≤245mW

For WIFI 5G@4cm (Antenna 1), the limit is Pmax≤74mW*2.5=185mW

For WIFI 5G@9cm (Antenna 2), the limit is Pmax≤128mW



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6 Measurement and Calculation

6.1 **Maximum transmit power**

The Power Data is based on the RF Test Report SHCR230400079101& SHCR230400079102.

2.4GHz WIFI:

Test Mode	Antenna	Channel	Power [dBm]	Power [mW]
	Ant1	2412	16.10	40.74
	Ant2	2412	16.50	44.67
440	Ant1	2437	16.09	40.64
11B	Ant2	2437	16.28	42.46
	Ant1	2462	16.33	42.95
	Ant2	2462	16.00	39.81
	Ant1	2412	15.11	32.43
	Ant2	2412	15.24	33.42
11G	Ant1	2437	15.55	35.89
IIG	Ant2	2437	15.22	33.27
	Ant1	2462	15.42	34.83
	Ant2	2462	15.30	33.88
	Ant1	2412	11.10	12.88
	Ant2	2412	10.94	12.42
	Total	2412	14.03	25.29
	Ant1	2437	11.15	13.03
11N20MIMO	Ant2	2437	10.78	11.97
	Total	2437	13.98	25.00
	Ant1	2462	11.30	13.49
	Ant2	2462	11.05	12.74
	Total	2462	14.19	26.24
	Ant1	2422	10.42	11.02
	Ant2	2422	10.60	11.48
	Total	2412	13.52	22.49
	Ant1	2437	10.59	11.46
11N40MIMO	Ant2	2437	10.62	11.53
	Total	2437	13.62	23.01
	Ant1	2452	10.17	10.40
	Ant2	2452	10.20	10.47
	Total	2452	13.20	20.89

5G WIFI:

00 1111 11				
Test Mode	Antenna	Channel	Power [dBm]	Power [mW]
	Ant1	5180	10.04	10.09
	Ant2	5180	10.48	11.17
11A	Ant1	5220	10.54	11.32
	Ant2	5220	11.31	13.52
	Ant1	5240	10.86	12.19
	Ant2	5240	11.95	15.67
1112011110	Ant1	5180	8.76	7.52
11N20MIMO	Ant2	5180	8.63	7.29



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	Total	5180	11.71	14.83
	Ant1	5220	8.62	7.28
	Ant2	5220	9.06	8.05
	Total	5220	11.86	15.35
	Ant1	5240	8.73	7.46
	Ant2	5240	9.03	8.00
	Total	5240	11.89	15.45
	Ant1	5190	7.86	6.11
	Ant2	5190	8.89	7.74
44140141140	Total	5190	11.42	13.87
11N40MIMO	Ant1	5230	8.51	7.10
	Ant2	5230	9.56	9.04
	Total	5230	12.08	16.14
	Ant1	5180	7.77	5.98
	Ant2	5180	8.58	7.21
	Total	5180	11.20	13.18
11AC20MIMO	Ant1	5220	7.60	5.75
	Ant2	5220	8.52	7.11
	Total	5220	11.09	12.85
	Ant1	5240	7.90	6.17
	Ant2	5240	8.86	7.69
	Total	5240	11.42	13.87
444040MIMO	Ant1	5190	8.40	6.92
	Ant2	5190	9.22	8.36
	Total	5190	11.84	15.28
11AC40MIMO	Ant1	5230	9.06	8.05
	Ant2	5230	9.63	9.18
	Total	5230	12.36	17.22
	Ant1	5210	8.13	6.50
11AC80MIMO	Ant2	5210	8.54	7.14
	Total	5210	11.35	13.65

6.2 RF Exposure Calculation

For FCC:

For single RF source:

	Evaluation method	Separation distance between the antenna to person (R)
	Blanket 1 mW Blanket Exemption	Regardless of separation distance
	MPE-based Exemption(ERP)	R ≥(λ /2 π)
\boxtimes	SAR-based Exemption($P_{ ext{th}}$)	0.5cm <r<40cm< td=""></r<40cm<>

2.4GHz WiFi

The Max Conducted Output Power is 44.67 mW for antenna1, 42.95 mW for antenna2, 26.24 mW for MIMO.

The best case gain of the antenna is 3.40dBi for antenna1 and 3.40dBi for antenna2. Directional gain: 6.41dBi.

3.40dBi logarithmic terms convert to numeric result is nearly 2.19.

6.41dBi logarithmic terms convert to numeric result is nearly 4.38.



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According to the formula. calculate the EIRP test result:

Antenna1: E.I.R.P.= P x G = 44.67 mW x 2.19 = 97.83mW < 143.032mW Antenna2: E.I.R.P.= $P \times G = 42.95 \text{ mW} \times 2.19 = 94.06 \text{mW} < 669.438 \text{mW}$ In MIMO mode: E.I.R.P.= P x G = 26.24 mW x 4.38= 114.93mW <143.032mW

5GHz WiFi

The Max Conducted Output Power is 12.19 mW for antenna1, 15.67 mW for antenna2, 17.22mW for MIMO.

The best case gain of the antenna is 4.89dBi for antenna1 and 4.89dBi for antenna2.

Directional gain: 7.9dBi.

4.89dBi logarithmic terms convert to numeric result is nearly 3.08. 7.9dBi logarithmic terms convert to numeric result is nearly 6.17.

According to the formula. calculate the EIRP test result:

Antenna1: E.I.R.P.= P x G = 12.19mW x 3.08 = 37.55mW < 109.846mW Antenna2: E.I.R.P.= P x G = 15.67 mW x 3.08 = 48.26mW < 587.259mW In MIMO mode: E.I.R.P.= P x G = 17.22mW x 6.17 = 106.24mW < 109.846mW

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

For IC:

2.4GHz WiFi:

Antenna1: E.I.R.P.= P x G = 44.67 mW x 2.19 = 97.83mW < 425mW Antenna2: E.I.R.P.= P x G = 42.95 mW x 2.19 = 94.06mW < 245mW In MIMO mode: E.I.R.P.= P x G = 26.24 mW x 4.38= 114.93mW <245mW 5GHz WiFi:

Antenna1: E.I.R.P.= P x G = 12.19mW x 3.08 = 37.55mW < 185mW Antenna2: E.I.R.P.= P x G = 15.67 mW x 3.08 = 48.26mW < 128mW In MIMO mode: E.I.R.P.= P x G = 17.22mW x 6.17 = 106.24mW < 128mW

So, the device is to qualify for FCC & IC SAR test exemption, the exemption report is in lieu of the SAR report.

-- End of the Report--



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