

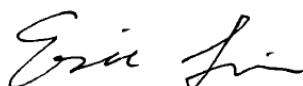
## 1 Cover Page

**RF Exposure Evaluation Report**

**Application No.:** KSCR2204000616AT  
**FCC ID:** 2AMVQ-WK321  
**IC:** 22969-WK321  
**Applicant:** Hangzhou Virtual And Reality Technology Co.,LTD.  
**Address of Applicant:** Room 901, Building 6, No.1818-2, West Wenyi Road, Yuhang Street, Yuhang District, Hangzhou, Zhejiang Province  
**Manufacturer:** Hangzhou Virtual And Reality Technology Co.,LTD.  
**Address of Manufacturer:** Room 901, Building 6, No.1818-2, West Wenyi Road, Yuhang Street, Yuhang District, Hangzhou, Zhejiang Province  
**Equipment Under Test (EUT):**  
**EUT Name:** Foot Sensor  
**Model No.:** WK321  
**Standard(s) :** FCC Rules 47 CFR §2.1093  
KDB 447498 D04 interim General RF Exposure Guidance v01  
RSS-102 Issue 5 Amendment 1 (February 2, 2021)  
**Date of Receipt:** 2022-05-31  
**Date of Test:** 2022-07-13 to 2022-07-13  
**Date of Issue:** 2022-07-16

<b>Test Result:</b>	<b>Pass*</b>
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\* In the configuration tested, the EUT complied with the standards specified above.



Eric Lin  
Laboratory Manager



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Revision Record				
Version	Chapter	Date	Modifier	Remark
01		2022-07-16		Original

Authorized for issue by:				
		Pawn. Liu		
		Pawn Liu/Project Engineer		
		Eric Lin		
		Eric Lin/Reviewer		



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## 3 General Information

### 3.1 General Description of E.U.T.

Power supply:	Battery:3.7V Li-Ion Polymer 370mA Input:5V,500mA
Product Type	Portable device
Serial Number:	CFA21D20001
Firmware Version:	V1.2

### 3.2 Details of E.U.T.

Operation Frequency:	2402MHz to 2480MHz
Bluetooth Version:	V5.0 LE
Data Rate:	1Mbps, 2Mbps
Modulation Type:	GFSK
Number of Channels:	40
Channel Spacing:	2MHz
Antenna Type:	Ceramic Antenna
Antenna Gain:	2dBi (Provided by the manufacturer)

### 3.3 Separation Distance

Separation distance between the antenna to person (R):	5mm
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.	



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### 3.4 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. 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:

• **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 (Kunshan) 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 Canada (ISED) as an accredited testing laboratory.

Company Number: 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 <sup>2</sup>
1.34	—	30	35.6 m	—	1.6 m	3,450 R <sup>2</sup> /f <sup>2</sup>
30	—	300	1.6 m	—	159 mm	3.83 R <sup>2</sup>
300	—	1,500	159 mm	—	31.8 mm	0.0128 R <sup>2</sup> f
1,500	—	100,000	31.8 mm	—	0.5 mm	19.2R <sup>2</sup>

Subscripts L and H are low and high;  $\lambda$  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



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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	<b>915</b>	0.0522	0.032
1500~100000MHz	<b>2480</b>	0.0193	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  $\lambda/4$ .

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.



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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	2.48	1.905	0.5	2.717

Remark: According to KDB447498 section 2.1.1,when 10-g extremity SAR applies, SAR test exemption may be considered by applying a factor of 2.5 to the SAR-based exemption thresholds.So the Limit is 6.7925Mw.



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## IC Radiofrequency radiation exposure limits:

### RF Exposure Compliance Requirement

All transmitters are exempt from routine SAR and RF exposure evaluations provided that they comply with the requirements of sections 2.5.1 or 2.5.2 of RSS102 issue 5 March 2015. If the equipment under test (EUT) meets the requirements of sections 2.5.1 or 2.5.2, applicants are only required to submit a properly signed declaration of compliance.

### Exemption Limits for Routine Evaluation — SAR Evaluation

SAR evaluation is required if the separation distance between the user and/or bystander and the antenna and/or radiating element of the device is less than or equal to 20 cm, except when the device operates at or below the applicable output power level (adjusted for tune-up tolerance) for the specified separation distance defined in Table 1.

**Table 1: SAR evaluation —**

### Exemption limits for routine evaluation based on frequency and separation distance

Frequency (MHz)	Exemption Limits (mW)				
	At separation distance of ≤5 mm	At separation distance of 10 mm	At separation distance of 15 mm	At separation distance of 20 mm	At separation distance of 25 mm
≤300	71 mW	101 mW	132 mW	162 mW	193 mW
450	52 mW	70 mW	88 mW	106 mW	123 mW
835	17 mW	30 mW	42 mW	55 mW	67 mW
1900	7 mW	10 mW	18 mW	34 mW	60 mW
2450	4 mW	7 mW	15 mW	30 mW	52 mW
3500	2 mW	6 mW	16 mW	32 mW	55 mW
5800	1 mW	6 mW	15 mW	27 mW	41 mW

Frequency (MHz)	Exemption Limits (mW)				
	At separation distance of 30 mm	At separation distance of 35 mm	At separation distance of 40 mm	At separation distance of 45 mm	At separation distance of ≥50 mm
≤300	223 mW	254 mW	284 mW	315 mW	345 mW
450	141 mW	159 mW	177 mW	195 mW	213 mW



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835	80 mW	92 mW	105 mW	117 mW	130 mW
1900	99 mW	153 mW	225 mW	316 mW	431 mW
2450	83 mW	123 mW	173 mW	235 mW	309 mW
3500	86 mW	124 mW	170 mW	225 mW	290 mW
5800	56 mW	71 mW	85 mW	97 mW	106 mW

Output power level shall be the higher of the maximum conducted or equivalent isotropically radiated power (e.i.r.p.) source-based, time-averaged output power. 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. For limb-worn devices where the 10 gram value applies, the exemption limits for routine evaluation in Table 1 are multiplied by a factor of 2.5. If the operating frequency of the device is between two frequencies located in Table 1, linear interpolation shall be applied for the applicable separation distance. For test separation distance less than 5 mm, the exemption limits for a separation distance of 5 mm can be applied to determine if a routine evaluation is required.

For medical implants devices, the exemption limit for routine evaluation is set at 1 mW. The output power of a medical implants device is defined as the higher of the conducted or e.i.r.p to determine whether the device is exempt from the SAR evaluation.



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For BT device, the limit of worse case is 4mW .This device is limb-worn devices where the 10 gram value applies .So the limit is 10Mw .



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## 5 Measurement and Calculation

### 5.1 Maximum transmit power

The Power Data is based on the RF Test Report KSCR220400061601

Test Mode	Test Frequency (MHz)	Output Power (dBm)	Output Power (mW)
1M	2402	5.57	3.61
	2442	5.44	3.50
	2480	5.03	3.18
2M	2402	5.61	<b>3.64</b>
	2440	5.48	3.53
	2480	5.03	3.18



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## 5.2 RF Exposure Calculation

### For FCC

#### BT:

The Max Conducted Peak Output Power is 3.64mW for, the best case gain of the antenna is 2dBi  
2dBi logarithmic terms convert to numeric result is nearly 1.58

According to the formula. calculate the EIRP test result:

Antenna:  $EIRP = P \times G = 3.64 \text{ mW} \times 1.58 = 5.75\text{mW}$

According to the KDB447498 section 7.2 determine the device is exclusion from SAR test

**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( $P_{th}$ )	6.7925mW(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:

#### BT mode:

Antenna :E.I.R.P.=  $P \times G = 0.00364 \times 1.58 = 0.00575\text{W} < 10\text{mW}$

So the device is exclusion from SAR test.

--End of the Report--



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