CERTIFICATE #4353.01

TEST REPORT

No.I23N00678-HAC RF

For

START USA, INC.

LTE Flip Feature Phone

Model Name: SH3320

With

Hardware Version: SH3320HV1.0

Software Version: SH3320SV014

FCC ID: 2AWF6-SH3320

Results Summary: M Category = M4

Issued Date: 2023-06-28

Designation Number: CN1210

Note:

The test results in this test report relate only to the devices specified in this report. This report shall not be reproduced except in full without the written approval of SAICT.

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REPORT HISTORY

Report Number	Revision	Description	Issue Date
I23N00678-HAC RF	Rev.0	1st edition	2023-06-28

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1. Summary of Test Report

1.1. Test Items

Description:	LTE Flip Feature Phone
Model Name:	SH3320
Applicant’s Name:	START USA, INC.
Manufacturer's Name:	THINKSTART ELECTRONIC TECHNOLOGY CO., LTD.

1.2. Test Standards

ANSI C63.19-2011

1.3. Test Result

Pass

1.4. Testing Location

Address: Building G, Shenzhen International Innovation Center, No.1006 Shennan Road, Futian District, Shenzhen, Guangdong, P. R. China

1.5. Project Data

Testing Start Date: 2023-06-21 Testing End Date: 2023-06-21

1.6. Signature

Li Yongfu
(Prepared this test report)

Liu Jian
(Reviewed this test report)

Cao Junfei
(Approved this test report)

2. Client Information

2.1. Applicant Information

Company Name:	START USA, INC.
Address:	6860 Dallas Parkway, Suite 200, Plano, TX 75024, USA
City:	Plano
Country:	USA
Telephone:	(+1) 972-688-6888

2.2. Manufacturer Information

Company Name:	THINKSTART ELECTRONIC TECHNOLOGY CO., LTD.
Address:	Unit A1-403, Kexing Science Park, 15 Keyuan Road, Nanshan District, Shenzhen, CHINA
City:	Shenzhen
Country:	China
Telephone:	(+86)189-4870-6595

3. Equipment under Test (EUT) and Ancillary Equipment (AE)

3.1. About EUT

Description:	LTE Flip Feature Phone
Mode Name:	SH3320
Condition of EUT as received:	No obvious damage in appearance
Frequency Bands:	WCDMA Band 2/4/5, LTE Band 2/4/5/12/66, Bluetooth, WLAN 2.4GHz

3.2. Internal Identification of EUT used during the test

EUT ID*	IMEI	HW Version	SW Version	Receipt Date
UT01aa	350935900000129	SH3320HV1.0	SH3320SV014	2023-04-18

*EUT ID: is used to identify the test sample in the lab internally.

Note: It is performed to test HAC with the UT01aa.

3.3. Internal Identification of AE used during the test

AE ID*	Description	Model	Manufacturer
AE1	Battery	SA3200	Phenix New Energy(Huizhou)Co.,Ltd.

*AE ID: is used to identify the test sample in the lab internally.

3.4. Air Interfaces / Bands Indicating Operating Modes

Air-interface	**Band(MHz)**	**Type**	**C63.19 / tested**	**Simultaneous Transmissions**	**Name of Voice Service**	**Power Reduction**
WCDMA	B2/B4/B5	VO	No	BT,WLAN	CMRS Voice	No
	HSPA	DT	No	BT,WLAN	NA	No
LTE (FDD)	2/4/5/12/66	VD	No	BT,WLAN	VoLTE	No
WLAN	2.4GHz	DT	No	WWAN	NA	No
Bluetooth	2.4GHz	DT	No	WWAN	NA	No

VO: Voice CMRS/PSTN Service Only

VD: Voice CMRS/PSTN and Data Service

DT: Digital Transport

* HAC Rating was not based on concurrent voice and data modes; Non-current mode was found to represent worst case rating for both M and T rating.

4. Reference Documents

The following document listed in this section is referred for testing.

Reference	Title	Version
ANSI C63.19-2011	American National Standard for Methods of Measurement of Compatibility between Wireless Communication Devices and Hearing Aids	2011
KDB 285076 D01	Equipment Authorization Guidance for Hearing Aid Compatibility	v06r02
KDB 285076 D02	Guidance for performing T-Coil tests for air interfaces supporting voice over IP (e.g., LTE and WiFi) to support CMRS based telephone services	v04
KDB 285076 D03	Heading Aid Compatibility Frequently Asked Questions	v01r06

5. Modulation Interference Factor (MIF)

The HAC Standard ANSI C63.19-2011 defines a new scaling using the Modulation Interference Factor (MIF) which replaces the need for the Articulation Weighting Factor (AWF) during the evaluation and is applicable to any modulation scheme.

The Modulation Interference factor (MIF, in dB) is added to the measured average E-field (in dBV/m) and converts it to the RF Audio Interference level (in dBV/m). This level considers the audible amplitude modulation components in the RF E-field. CW fields without amplitude modulation are assumed to not interfere with the hearing aid electronics. Modulations without time slots and low fluctuations at low frequencies have low MIF values, TDMA modulations with narrow transmission and repetition rates of few 100 Hz have high MIF values and give similar classifications as ANSI C63-2007.

Definitions

ER3D, E-field probes have a bandwidth <10 kHz and can therefore not evaluate the RF envelope in the full audio band. DASY52 is therefore using the “indirect” measurement method according to ANSI C63.19-2011 which is the primary method. These near field probes read the averaged E-field measurement. Especially for the new high peak-to-average (PAR) signal types, the probes shall be linearized by probe modulation response (PMR) calibration in order to not overestimate the field reading.

The evaluation method or the MIF is defined in ANSI C63.19-2011 section D.7. An RMS demodulated RF signal is fed to a spectral filter (similar to an A weighting filter) and forwarded to a temporal filter acting as a quasi-peak detector. The averaged output of these filtering is called to a 1 kHz 80% AM signal as reference. MIF measurement requires additional instrumentation and is not well suited for evaluation by the end user with reasonable uncertainty It may alternatively be determined through analysis and simulation, because it is constraint and characteristic for a communication signal. DASY52 uses well defined signals for PMR calibration. The MIF of these signals has been determined by simulation and is automatically applied.

MIF values were not tested by a probe or as specified in the standards but are based on analysis provided by SPEAG for all the air interfaces (GSM, WCDMA, CDMA, LTE). The data included in this report are for the worst case operating modes. The UIDs used are listed below:

UID	Communication System Name	MIF (dB)
10460	UMTS-FDD (WCDMA, AMR)	-25.43
10170	LTE-FDD(SC-FDMA, 1RB, 20MHz, 16-QAM)	-9.76
10176	LTE-FDD(SC-FDMA, 1RB, 10MHz, 16-QAM)	-9.76

A PMR calibrated probe is linearized for the selected waveform over the full dynamic range within the uncertainty specified in its calibration certificate. ER3D, EF3D and EU2D E-field probes have a bandwidth <10 kHz and can therefore not evaluate the RF envelope in the full audio band. DASY52 is therefore using the \indirect" measurement method according to ANSI C63.19-2011 which is the primary method. These near field probes read the averaged E-field measurement. Especially for the new high peak-to-average (PAR) signal types, the probes shall be linearized by PMR calibration in order to not overestimate the field reading.

The MIF measurement uncertainty is estimated as follows, for modulation frequencies from slotted waveforms with fundamental frequency and at least 2 harmonics within 10 kHz:

0.2 dB for MIF -7 to +5 dB,
0.5 dB for MIF -13 to +11 dB
1 dB for MIF > -20 dB

6. Evaluation for low-power exemption

6.1. Product testing threshold

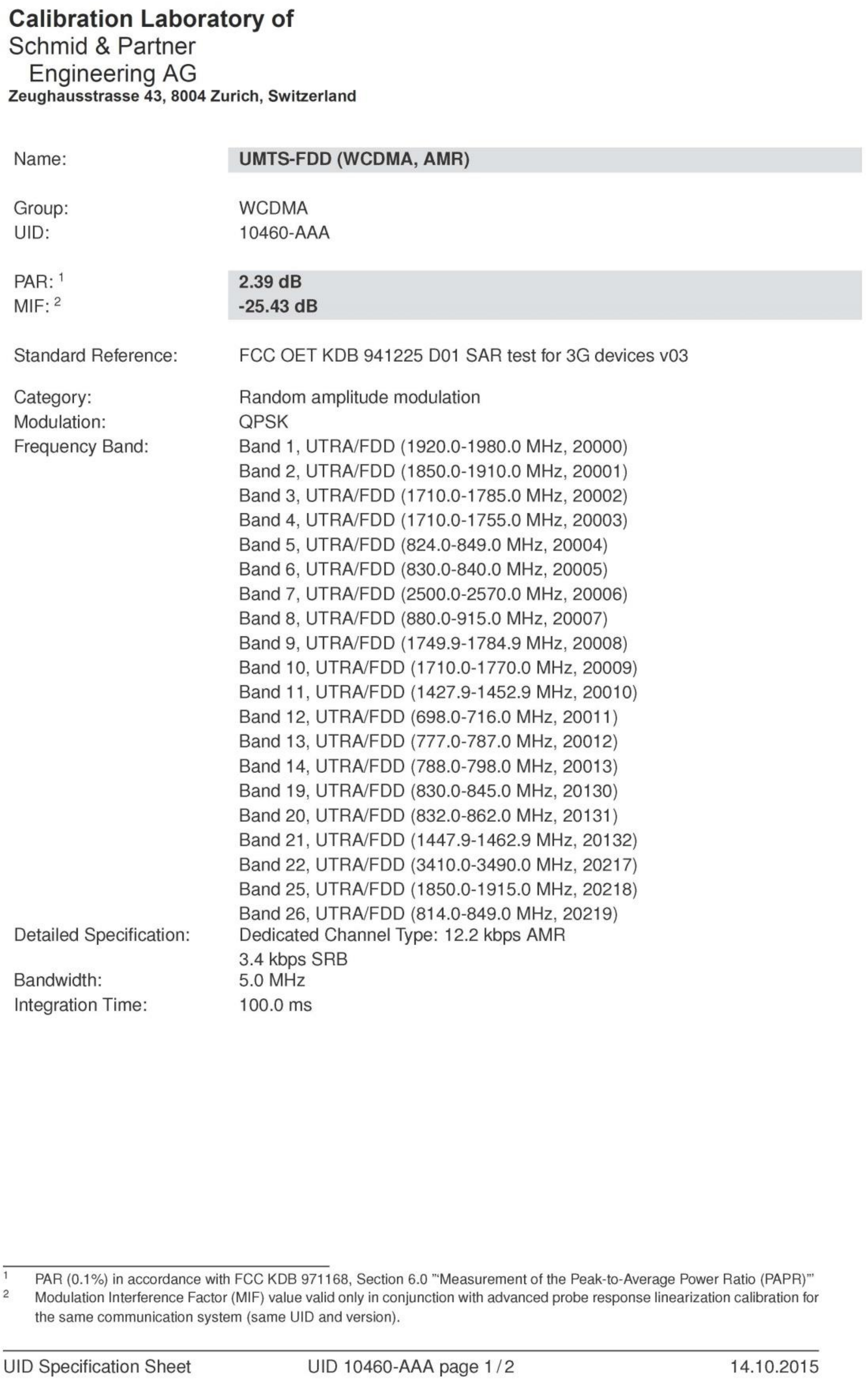
There are two methods for exempting an RF air interface technology from testing. The first method requires evaluation of the MIF for the worst-case operating mode. An RF air interface technology of a device is exempt from testing when its average antenna input power plus its MIF is ≤17 dBm for any of its operating modes. The second method does not require determination of the MIF. The RF emissions testing exemption shall be applied to an RF air interface technology in a device whose peak antenna input power, averaged over intervals ≤50 μs20, is ≤23 dBm. An RF air interface technology that is exempted from testing by either method shall be rated as M4.
The two methods are used to be exempt from testing for the RF air interface technology in this report.

6.2. Average conducted power

Band	Power (dBm)	MIF (dB)	Sum (dBm)	HAC Test
WCDMA Band 2	23.5	-25.43	-1.93	No
WCDMA Band 4	23.5	-25.43	-1.93	No
WCDMA Band 5	23.5	-25.43	-1.93	No
LTE Band 2	24.0	-9.76	14.24	No
LTE Band 4	24.0	-9.76	14.24	No
LTE Band 5	24.5	-9.76	14.74	No
LTE Band 12	24.5	-9.76	14.74	No
LTE Band 66	24.0	-9.76	14.24	No

Note: Power = Max tune-up limit

ANNEX A: UID Specification



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Name:	**UMTS-FDD (WCDMA, AMR)**
Group:	WCDMA
UID:	10460-AAA
PAR: [1]	**2.39 dB**
MIF: [2]	**-25.43 dB**
Standard Reference:	FCC OET KDB 941225 D01 SAR test for 3G devices v03
Category:	Random amplitude modulation
Modulation:	QPSK
Frequency Band:	Band 1, UTRA/FDD (1920.0-1980.0 MHz, 20000) Band 2, UTRA/FDD (1850.0-1910.0 MHz, 20001) Band 3, UTRA/FDD (1710.0-1785.0 MHz, 20002) Band 4, UTRA/FDD (1710.0-1755.0 MHz, 20003) Band 5, UTRA/FDD (824.0-849.0 MHz, 20004) Band 6, UTRA/FDD (830.0-840.0 MHz, 20005) Band 7, UTRA/FDD (2500.0-2570.0 MHz, 20006) Band 8, UTRA/FDD (880.0-915.0 MHz, 20007) Band 9, UTRA/FDD (1749.9-1784.9 MHz, 20008) Band 10, UTRA/FDD (1710.0-1770.0 MHz, 20009) Band 11, UTRA/FDD (1427.9-1452.9 MHz, 20010) Band 12, UTRA/FDD (698.0-716.0 MHz, 20011) Band 13, UTRA/FDD (777.0-787.0 MHz, 20012) Band 14, UTRA/FDD (788.0-798.0 MHz, 20013) Band 19, UTRA/FDD (830.0-845.0 MHz, 20130) Band 20, UTRA/FDD (832.0-862.0 MHz, 20131) Band 21, UTRA/FDD (1447.9-1462.9 MHz, 20132) Band 22, UTRA/FDD (3410.0-3490.0 MHz, 20217) Band 25, UTRA/FDD (1850.0-1915.0 MHz, 20218) Band 26, UTRA/FDD (814.0-849.0 MHz, 20219)
Detailed Specification:	Dedicated Channel Type: 12.2 kbps AMR 3.4 kbps SRB
Bandwidth:	5.0 MHz
Integration Time:	100.0 ms

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[1] PAR (0.1%) in accordance with FCC KDB 971168, Section 6.0 "'Measurement of the Peak-to-Average Power Ratio (PAPR)"'

[2] Modulation Interference Factor (MIF) value valid only in conjunction with advanced probe response linearization calibration for the same communication system (same UID and version).

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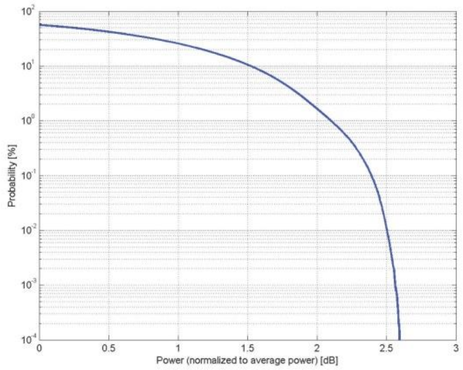
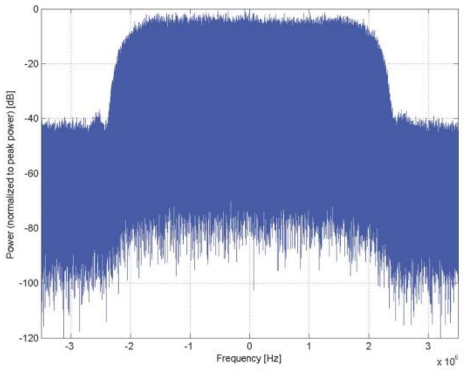
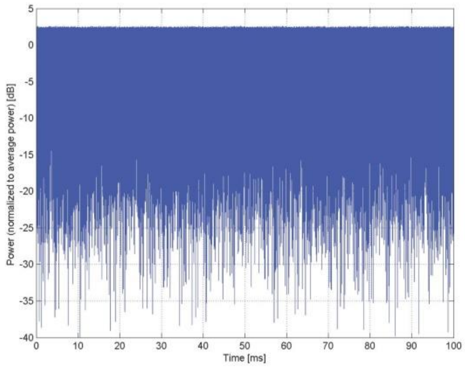


Complementary Cumulative Distribution Function (CCDF)



Frequency Domain



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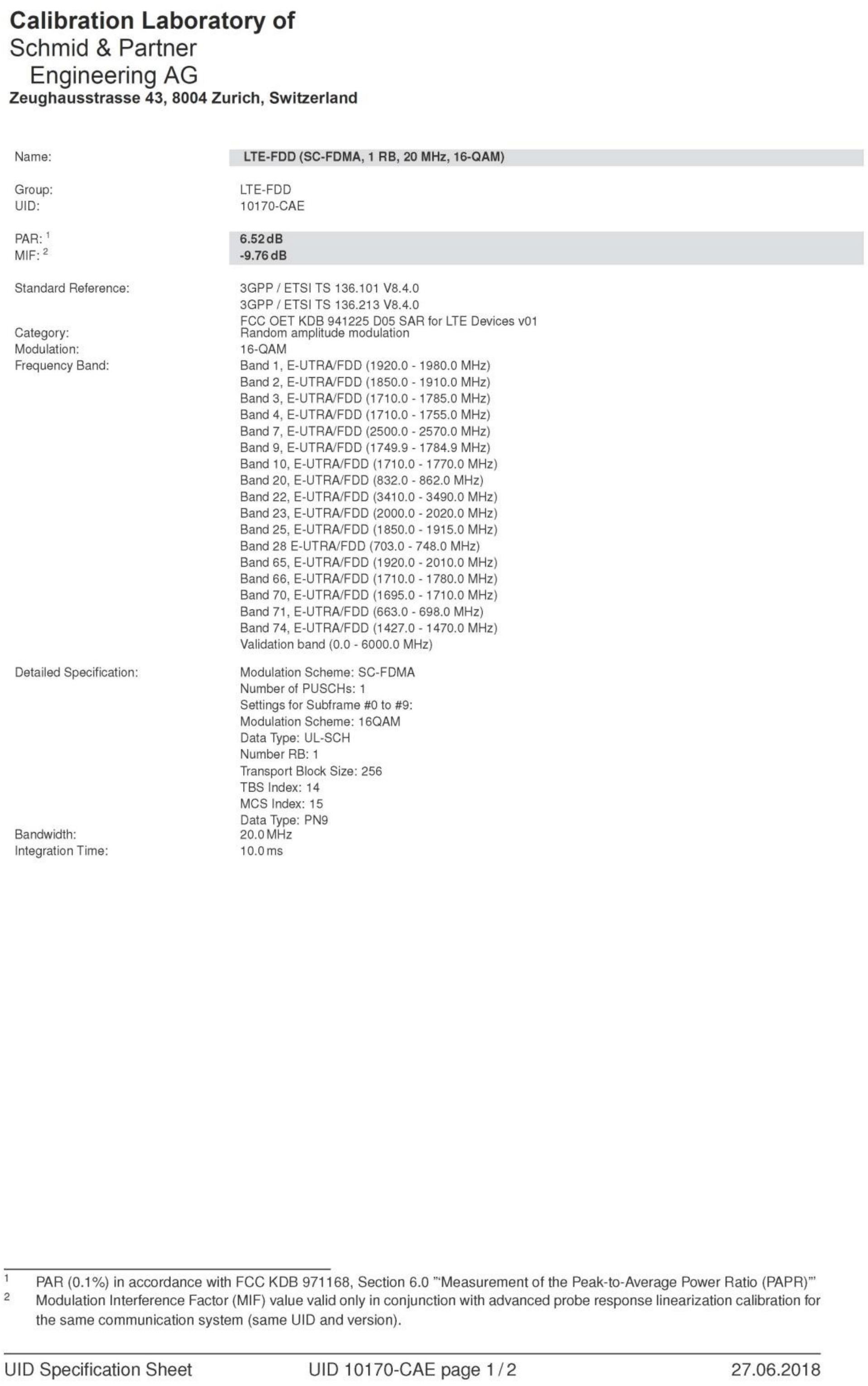

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Name:	**LTE-FDD (SC-FDMA, 1 RB, 20 MHz, 16-QAM)**
Group:	LTE-FDD
UID:	10170-CAE
PAR: [1]	**6.52 dB**
MIF: [2]	**-9.76 dB**
Standard Reference:	3GPP / ETSI TS 136.101 V8.4.0 3GPP / ETSI TS 136.213 V8.4.0 FCC OET KDB 941225 D05 SAR for LTE Devices v01
Category:	Random amplitude modulation
Modulation:	16-QAM
Frequency Band:	Band 1, E-UTRA/FDD (1920.0 - 1980.0 MHz) Band 2, E-UTRA/FDD (1850.0 - 1910.0 MHz) Band 3, E-UTRA/FDD (1710.0 - 1785.0 MHz) Band 4, E-UTRA/FDD (1710.0 - 1755.0 MHz) Band 7, E-UTRA/FDD (2500.0 - 2570.0 MHz) Band 9, E-UTRA/FDD (1749.9 - 1784.9 MHz) Band 10, E-UTRA/FDD (1710.0 - 1770.0 MHz) Band 20, E-UTRA/FDD (832.0 - 862.0 MHz) Band 22, E-UTRA/FDD (3410.0 - 3490.0 MHz) Band 23, E-UTRA/FDD (2000.0 - 2020.0 MHz) Band 25, E-UTRA/FDD (1850.0 - 1915.0 MHz) Band 28 E-UTRA/FDD (703.0 - 748.0 MHz) Band 65, E-UTRA/FDD (1920.0 - 2010.0 MHz) Band 66, E-UTRA/FDD (1710.0 - 1780.0 MHz) Band 70, E-UTRA/FDD (1695.0 - 1710.0 MHz) Band 71, E-UTRA/FDD (663.0 - 698.0 MHz) Band 74, E-UTRA/FDD (1427.0 - 1470.0 MHz) Validation band (0.0 - 6000.0 MHz)
Detailed Specification:	Modulation Scheme: SC-FDMA Number of PUSCHs: 1 Settings for Subframe #0 to #9: Modulation Scheme: 16QAM Data Type: UL-SCH Number RB: 1 Transport Block Size: 256 TBS Index: 14 MCS Index: 15 Data Type: PN9
Bandwidth:	20.0 MHz
Integration Time:	10.0 ms

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[1] PAR (0.1%) in accordance with FCC KDB 971168, Section 6.0 "'Measurement of the Peak-to-Average Power Ratio (PAPR)'"

[2] Modulation Interference Factor (MIF) value valid only in conjunction with advanced probe response linearization calibration for the same communication system (same UID and version).

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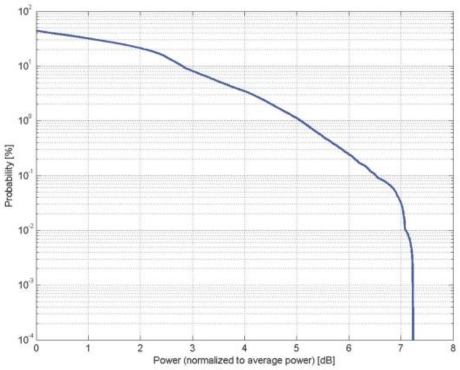
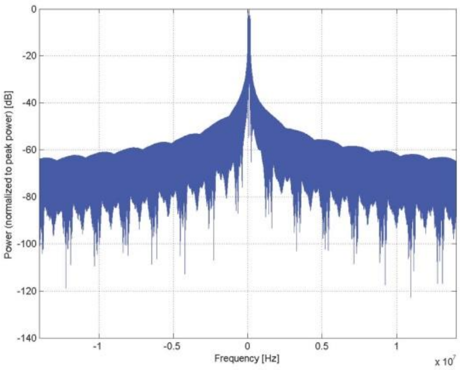
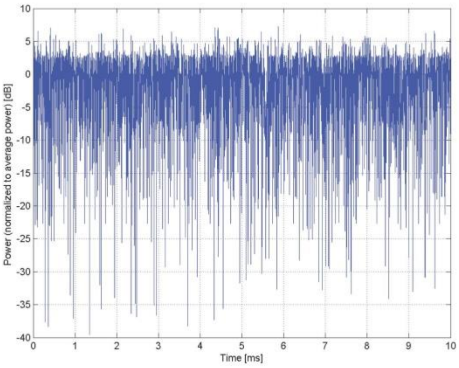


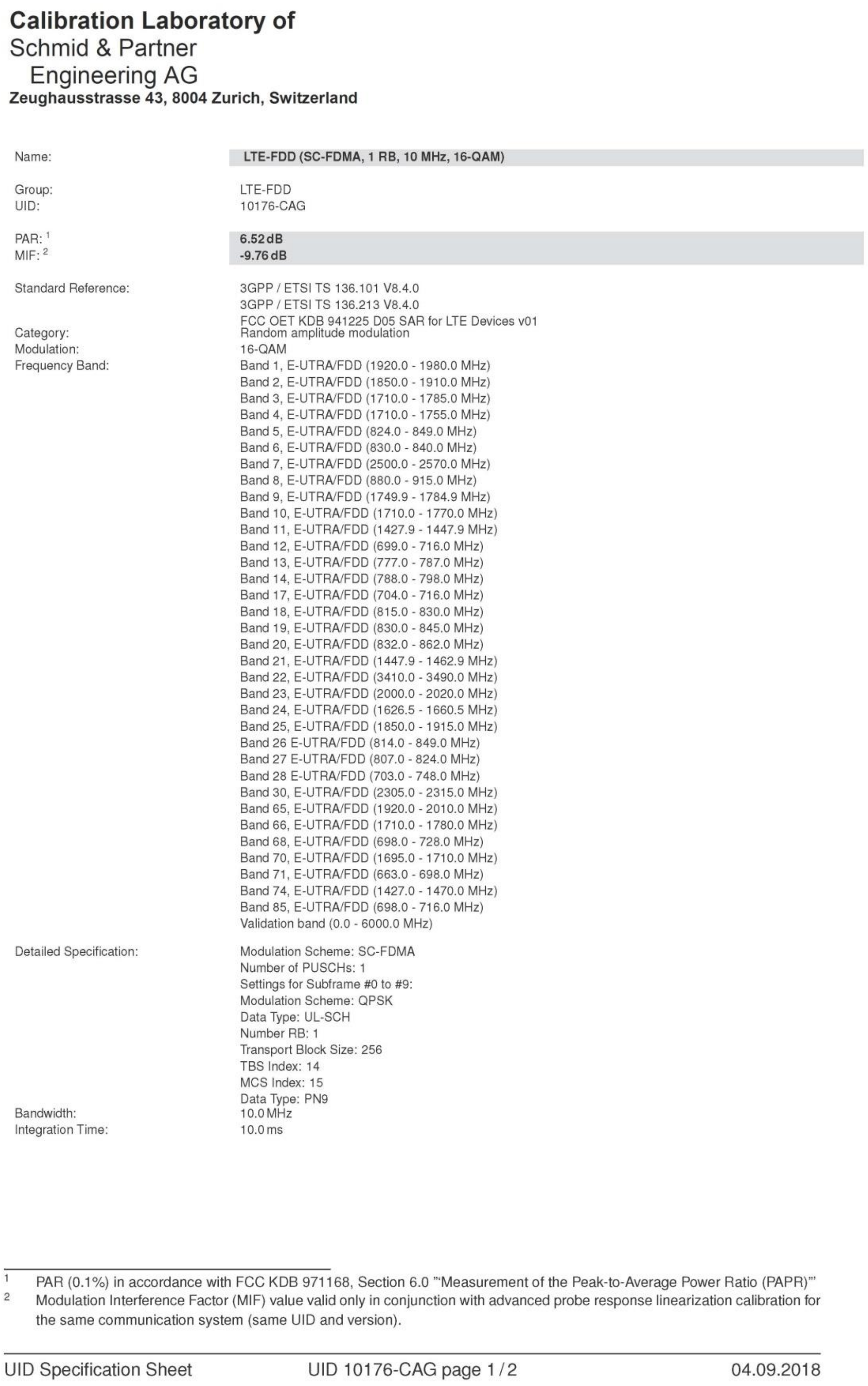
Complementary Cumulative Distribution Function (CCDF)



Frequency Domain



Time Domain



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Name:	**LTE-FDD (SC-FDMA, 1 RB, 10 MHz, 16-QAM)**
Group:	LTE-FDD
UID:	10176-CAG
PAR: [1]	**6.52 dB**
MIF: [2]	**-9.76 dB**
Standard Reference:	3GPP / ETSI TS 136.101 V8.4.0 3GPP / ETSI TS 136.213 V8.4.0 FCC OET KDB 941225 D05 SAR for LTE Devices v01
Category:	Random amplitude modulation
Modulation:	16-QAM
Frequency Band:	Band 1, E-UTRA/FDD (1920.0 - 1980.0 MHz) Band 2, E-UTRA/FDD (1850.0 - 1910.0 MHz) Band 3, E-UTRA/FDD (1710.0 - 1785.0 MHz) Band 4, E-UTRA/FDD (1710.0 - 1755.0 MHz) Band 5, E-UTRA/FDD (824.0 - 849.0 MHz) Band 6, E-UTRA/FDD (830.0 - 840.0 MHz) Band 7, E-UTRA/FDD (2500.0 - 2570.0 MHz) Band 8, E-UTRA/FDD (880.0 - 915.0 MHz) Band 9, E-UTRA/FDD (1749.9 - 1784.9 MHz) Band 10, E-UTRA/FDD (1710.0 - 1770.0 MHz) Band 11, E-UTRA/FDD (1427.9 - 1447.9 MHz) Band 12, E-UTRA/FDD (699.0 - 716.0 MHz) Band 13, E-UTRA/FDD (777.0 - 787.0 MHz) Band 14, E-UTRA/FDD (788.0 - 798.0 MHz) Band 17, E-UTRA/FDD (704.0 - 716.0 MHz) Band 18, E-UTRA/FDD (815.0 - 830.0 MHz) Band 19, E-UTRA/FDD (830.0 - 845.0 MHz) Band 20, E-UTRA/FDD (832.0 - 862.0 MHz) Band 21, E-UTRA/FDD (1447.9 - 1462.9 MHz) Band 22, E-UTRA/FDD (3410.0 - 3490.0 MHz) Band 23, E-UTRA/FDD (2000.0 - 2020.0 MHz) Band 24, E-UTRA/FDD (1626.5 - 1660.5 MHz) Band 25, E-UTRA/FDD (1850.0 - 1915.0 MHz) Band 26 E-UTRA/FDD (814.0 - 849.0 MHz) Band 27 E-UTRA/FDD (807.0 - 824.0 MHz) Band 28 E-UTRA/FDD (703.0 - 748.0 MHz) Band 30, E-UTRA/FDD (2305.0 - 2315.0 MHz) Band 65, E-UTRA/FDD (1920.0 - 2010.0 MHz) Band 66, E-UTRA/FDD (1710.0 - 1780.0 MHz) Band 68, E-UTRA/FDD (698.0 - 728.0 MHz) Band 70, E-UTRA/FDD (1695.0 - 1710.0 MHz) Band 71, E-UTRA/FDD (663.0 - 698.0 MHz) Band 74, E-UTRA/FDD (1427.0 - 1470.0 MHz) Band 85, E-UTRA/FDD (698.0 - 716.0 MHz) Validation band (0.0 - 6000.0 MHz)
Detailed Specification:	Modulation Scheme: SC-FDMA Number of PUSCHs: 1 Settings for Subframe #0 to #9: Modulation Scheme: QPSK Data Type: UL-SCH Number RB: 1 Transport Block Size: 256 TBS Index: 14 MCS Index: 15 Data Type: PN9
Bandwidth:	10.0 MHz
Integration Time:	10.0 ms

---

[1] PAR (0.1%) in accordance with FCC KDB 971168, Section 6.0 "'Measurement of the Peak-to-Average Power Ratio (PAPR)'"

[2] Modulation Interference Factor (MIF) value valid only in conjunction with advanced probe response linearization calibration for the same communication system (same UID and version).

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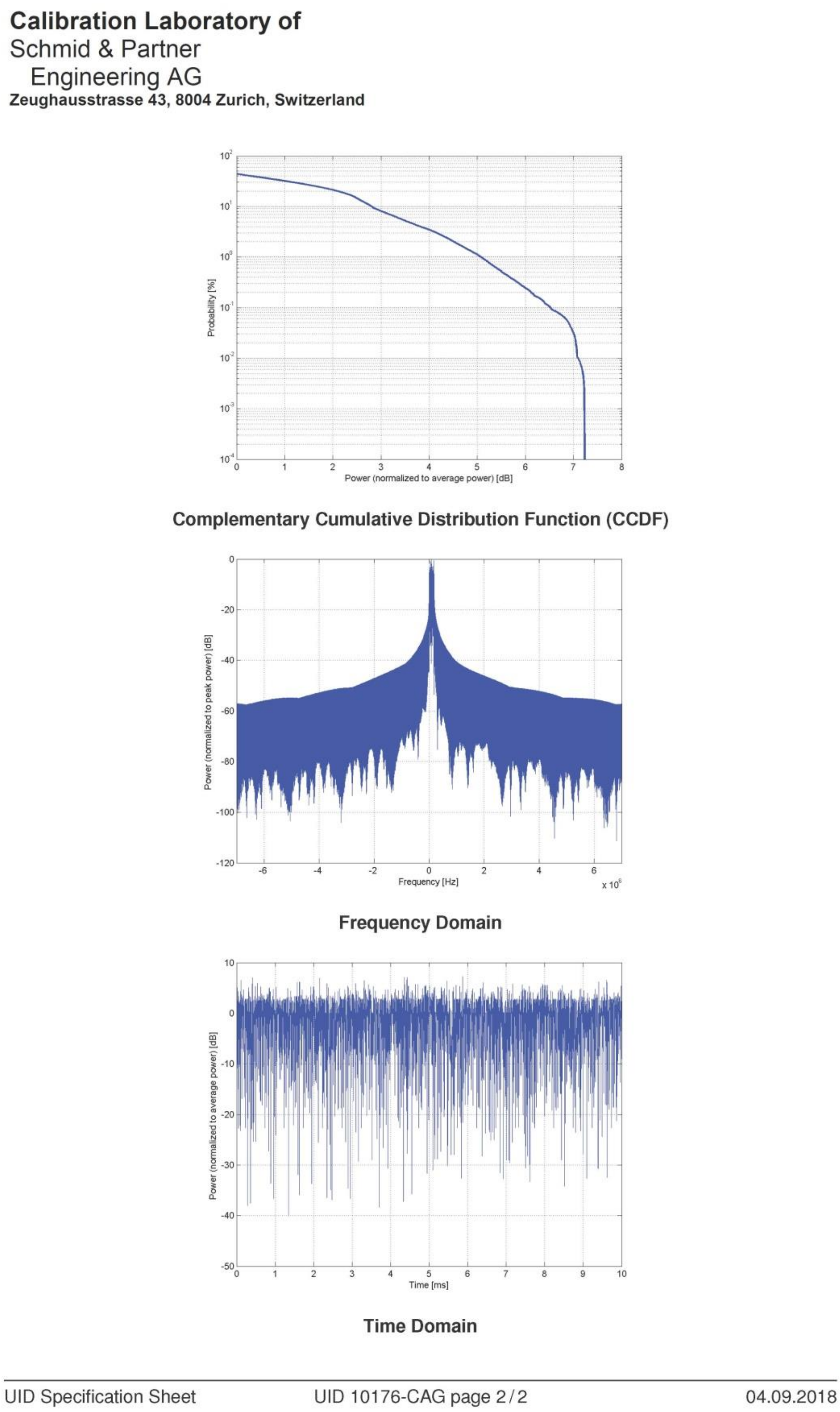
Probability [%]
10^2
10^1
10^0
10^-1
10^-2
10^-3
10^-4
0
1
2
3
4
5
6
7
8
Power (normalized to average power) [dB]
Power (normalized to peak power) [dB]
0
-20
-40
-60
-80
-100
-120
-6
-4
-2
0
2
4
6
Frequency [Hz]
x 10^6
Power (normalized to average power) [dB]
10
0
-10
-20
-30
-40
-50
0
1
2
3
4
5
6
7
8
9
10
Time [ms]

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Complementary Cumulative Distribution Function (CCDF)

Frequency Domain

Time Domain

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*****END OF REPORT*****