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### 1 Cover Page

RF Exposure Evaluation Report

Application No.: KSCR2206000918AT

**FCC ID**: 2AXVM-A50T **IC**: 26572-A50T

Applicant: Hangzhou Microimage Software Co.,Ltd

Address of Applicant:

Room 313, Unit B, Building 2, 399 Danfeng Road, Xixing

Subdistrict, Binjiang District, Hangzhou, Zhejiang

Manufacturer: Hangzhou Microimage Software Co.,Ltd

Address of Manufacturer: Room 313, Unit B, Building 2, 399 Danfeng Road, Xixing Subdistrict, Binjiang District, Hangzhou, Zhejiang

Factory: Hangzhou Microimage Intelligent Technology Co., Ltd.

Floor 2, Building A1, 299 Qiushi Road, Tonglu Economic Development

Address of Factory: Zone, Tonglu County, Hangzhou City, Zhejiang Province

**Equipment Under Test (EUT):** 

**EUT Name:** Digital Night Vision Scope

Model No.: A50T Add Model No: A50TN

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:** 2022-06-20

**Date of Test:** 2022-06-20 to 2022-07-07

**Date of Issue:** 2022-07-08

Test Result: Pass\*

Eric Lin EMC Laboratory Manager



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<sup>\*</sup> In the configuration tested, the EUT complied with the standards specified above.



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Revision Record								
Version Description Date Remark								
00	Original	2022-07-08	/					

Authorized for issue by:		
	Tonnie Tang	
	Tommie_Tang/Project Engineer	
	Esia fri	
	Eric Lin/Reviewer	



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### 3 General Information

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

	•
	DC 5V,3A/9V,2A/12V,1.5A by USB or DC 3V by battery
	Rechargeable Li-ion Battery Model: 18650 MJ1
Power supply:	Rated Capacity: 3350mAh,12.18Wh
	Typical Capacity: 3400mAh,12.3Wh
	Max. Charge Voltage: 4.2V
	□ Portable device
Product Type:	☐ Mobile device
	☐ Fixed device
Serial Number:	J70560148
Firmware Version:	V5.5.40 build 220608

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

### 2..4G WIFI

Operation Frequency	802.11b/g/n(HT20): 2412MHz to 2462MHz;
Operation Frequency:	802.11n(HT40): 2422MHz to 2452MHz
Modulation Type:	802.11b: DSSS (CCK, DQPSK, DBPSK);
Modulation Type.	802.11g/n: OFDM (64QAM, 16QAM, QPSK, BPSK)
Number of Channels:	802.11b/g/n(HT20):11;
Number of Charmers.	802.11n(HT40):7
Channel Spacing:	5MHz
Antenna Type:	PCB Antenna
Antenna Gain:	-2.16dBi (Provided by the manufacturer)

### **BT**

Operation Frequency:	2402MHz to 2480MHz
Bluetooth Version:	V5.0 Classic
Modulation Type:	GFSK, pi/4DQPSK, 8DPSK
Number of Channels:	79
Channel Spacing:	1MHz
Spectrum Spread	Frequency Hopping Spread Spectrum(FHSS)
Technology:	Trequency hopping opiead opeciful (1133)
Antenna Type:	PCB Antenna
Antenna Gain:	-17.47dBi (Provided by the manufacturer)



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### 3.3 Separation Distance

The distance between WIFI&BT antenna and handle of the EUT is 5mm. The distance between WIFI antenna and the head of human (R): 84mm 100 100



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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,



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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 Weive 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			Minim	Threshold ERP		
f∟ MHz		f <sub>H</sub> MHz	λ <sub>L</sub> / 2π		λ <sub>H</sub> / 2π	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; 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



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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*<sub>20cm</sub> in Formula (B.1) [repeated from §2.1091(c)(1); also in §1.1307(b)(1)(i)(B)].

$$P_{\text{th }}(\text{mW}) = ERP_{20 \text{ cm }}(\text{mW}) = \begin{cases} 2040f & 0.3 \text{ GHz} \le f < 1.5 \text{ GHz} \\ \\ 3060 & 1.5 \text{ GHz} \le f \le 6 \text{ GHz} \end{cases}$$
(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) $R(N2\pi)(m)$ Threshold ERP(W)							
300~1500MHz	915	0.0522	0.032				
1500~100000MHz	2480	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  $\S1.1307(b)(3)(i)(B)$ , 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).

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



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

Table B.2—Example Power Thresholds (mW)

Frequency		Distan	ce(mm)							
(MHz)	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

#### For the hand:

Limit calculation							
Frequency range(GHz) Frequency(GHz) X Distance(cm) Pth (mW)							
WIFI: 1.5~6	2.462	1.903	0.5	2.733			
BT: 1.5~6	2.48	1.905	0.5	2.717			

The SAR-based exemption threshold for WIFI: 2.733\*2.5mW=6.83mW The SAR-based exemption threshold for BT: 2.717\*2.5mW=6.79mW

### For the head:

Limit calculation								
Frequency range(GHz)	Frequency range(GHz) Frequency(GHz) X Distance(cm) Pth (mW)							
WIFI: 1.5~6	2.462	1.903	9.9	802.583				
BT: 1.5~6	2.48	1.905	8.4	586.257				



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### 5 IC Radiofrequency radiation exposure limits:

According to RSS-102 section 2.5.1, 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 4,5

	Exemption Limits (mW)							
Frequency	At separation	At separation	At separation	At separation	At separation			
(MHz)	distance of ≤5	distance of 10	distance of 15	distance of 20	distance of 25			
	mm	mm	mm	mm	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			

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



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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 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.

The practical use condition for this device is as a limb-worn accessories. So the applicable limit is 10-g aextremity SAR

For the hand: 4\*2.5=10mW

For the head: 309mW



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### 6 Measurement and Calculation

### 6.1 Maximum transmit power

The Power Data is based on the RF Test Report KSCR220600091801& KSCR220600091802.

Test Mode	Test Channel	Ant	Power [dBm]	Power [mW]
11B	2412	Ant1	7.30	5.37
11B	2437	Ant1	7.76	5.97
11B	2462	Ant1	7.94	6.22
11G	2412	Ant1	7.00	5.01
11G	2437	Ant1	7.33	5.41
11G	2462	Ant1	7.68	5.86
11N20SISO	2412	Ant1	6.89	4.89
11N20SISO	2437	Ant1	7.28	5.35
11N20SISO	2462	Ant1	7.63	5.79
11N40SISO	2422	Ant1	5.69	3.71
11N40SISO	2437	Ant1	5.89	3.88
11N40SISO	2452	Ant1	6.09	4.06

Test Mode	Test Frequency (MHz)	Output Power (dBm)	Reading Power (mW)
	2402	-5.57	0.28
GFSK	2441	-4.90	0.32
0. 0	2480	-4.22	0.38
	2402	-5.54	0.28
π/4DQPSK	2441	-4.83	0.33
	2480	-4.13	0.39
	2402	-5.48	0.28
8DPSK	2441	-4.78	0.33
52. GIV	2480	-4.08	0.39



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### 6.2 RF Exposure Calculation

For 2.4G WIFI:

The Max Conducted Peak Output Power is 6.22mW. The best case gain of the antenna is -2.16dBi.

-2.16dBi logarithmic terms convert to numeric result is nearly 0.61.

For BT:

The Max Conducted Peak Output Power is 0.39mW. The best case gain of the antenna is -17.47dBi.

-17.47dBi logarithmic terms convert to numeric result is nearly 0.02.

For the head of FCC:

2.4G WIFI: According to the formula. calculate the power test result:

P = 6.22 mW < 802.583mW

BT: According to the formula. calculate the power test result:

P = 0.39mW < 586.257mW

2.4G WIFI and BT can transmit simultaneously, and 6.22/802.583+0.39/586.257= 0.008<1, so the device is to qualify for SAR test exemption.

For the hand of FCC:

2.4G WIFI: According to the formula. calculate the power test result:

P = 6.22 mW < 6.83 mW

BT: According to the formula. calculate the power test result:

P = 0.39 mW < 6.79 mW

2.4G WIFI and BT can transmit simultaneously, and 6.22/6.83+0.39/6.79=0.97<1, so the device is to qualify for SAR test exemption.

For the head of IC:

2.4G WIFI: According to the formula. calculate the test result:

P = 6.22 mW < 309 mW

BT: According to the formula. calculate the test result:

P = 0.39 mW < 309 mW



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2.4G WIFI and BT can transmit simultaneously, and 6.22/309+0.39/309=0.0214<1, so the device is to qualify for SAR test exemption.

For the hand of IC:

2.4G WIFI: According to the formula. calculate the test result:

P = 6.22 mW < 10 mW

BT: According to the formula. calculate the EIRP test result:

P = 0.39 mW < 10 mW

2.4G WIFI and BT can transmit simultaneously, and 6.22/10+0.39/10=0.661<1, so the device is to qualify for SAR test exemption.

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

-- End of the Report--



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