



Test report No:
2360669R-RF-US-P20V01

SAR Exemption Evaluation Report

Product Name	LocoTag
Trademark	LocoTrack Primary
Model and /or type reference	T1B
FCC ID	2AYMO-LT-T1B
Applicant's name / address	System Loco Ltd Parkfield, Greaves Park, Lancaster
Test method requested, standard	FCC 47CFR §2.1093
Verdict Summary	IN COMPLIANCE
Documented By (name / position & signature)	Feng Jiao/ Project Engineer 
Approved by (name / position & signature)	Jack Zhang/ Manager 
Date of issue	2023-08-17
Report Version	V1.0
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GENERAL CONDITIONS

Test Location	No. 99, Hongye Road, Suzhou Industrial Park Suzhou, 215006, P.R. China
Date(receive sample)	Jun. 29, 2023
Date (start test)	Jul. 02, 2023
Date (finish test)	Aug. 01, 2023

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ENVIRONMENTAL CONDITIONS

The climatic conditions during the tests are within the limits specified by the manufacturer for the operation of the EUT and the test equipment. The climatic conditions during the tests were within the following limits:

Ambient temperature	15 °C – 35 °C
Relative Humidity air	30% - 60%

If explicitly required in the basic standard or applied product / product family standard the climatic values are recorded and documented separately in this test report.

POSSIBLE TEST CASE VERDICTS

Test case does not apply to test object	N/A
Test object does meet requirement	P (Pass) / PASS
Test object does not meet requirement	F (Fail) / FAIL
Not measured	N/M

ABBREVIATIONS

For the purposes of the present document, the following abbreviations apply:

EUT	: Equipment Under Test
QP	: Quasi-Peak
CAV	: CISPR Average
AV	: Average
CDN	: Coupling Decoupling Network
SAC	: Semi-Anechoic Chamber
OATS	: Open Area Test Site
BW	: Bandwidth
AM	: Amplitude Modulation
PM	: Pulse Modulation
HCP	: Horizontal Coupling Plane
VCP	: Vertical Coupling Plane
U_N	: Nominal voltage
T_x	: Transmitter
R_x	: Receiver
N/A	: Not Applicable
N/M	: Not Measured

DOCUMENT HISTORY

Report No.	Version	Description	Issued Date
2360669R-RF-US-P20V01	V1.0	Initial issue of report.	2023-08-17

REMARKS AND COMMENTS

1. The equipment under test (EUT) does meet the essential requirements of the stated standard(s)/test(s).
2. These test results on a sample of the device are for the purpose of demonstrating Compliance with FCC 47CFR §2.1093.
3. The measurement result is considered in conformance with the requirement if it is within the prescribed limit, It is not necessary to account the uncertainty associated with the measurement result.
4. The test results relate only to the samples tested.
5. The test report shall not be reproduced without the written approval of DEKRA Testing and Certification (Suzhou) Co., Ltd.
6. This report will not be used for social proof function in China market.
7. DEKRA declines any responsibility with the following test data provided by customer that may affect the validity of result:
 - Chapter 1.1 General Description of the Item(s);
 - Chapter 1.2 Antenna Informaion;

1.1 General Description of the Item(s)

Product Name :	LocoTag
Model No. :	T1B
Trademark. :	LocoTrack Primary
FCC ID :	2AYMO-LT-T1B
Hardware Version :	T1B-1-0
Software Version :	2.38.0
Manufacturer :	System Loco Ltd
Manufacturer Address..... :	Parkfield, Greaves Park, Lancaster

Wireless specification	Bluetooth (LE)					
Operating frequency range(s)	2402~2480MHz					
Type of Modulation	GFSK					
PHYs	<input checked="" type="checkbox"/>	LE 1M	<input checked="" type="checkbox"/>	LE 2M	<input type="checkbox"/>	LE Coded S=2/8
Data Rate	<input checked="" type="checkbox"/>	1Mbit/s	<input checked="" type="checkbox"/>	2Mbit/s	<input type="checkbox"/>	500/125 Kbit/s
Number of channel..... :	40					

Rated power supply	Voltage and Frequency					
	<input type="checkbox"/>	AC: 220 - 240 V, 50/60 Hz				
	<input type="checkbox"/>	AC: 100 - 240 V, 50/60 Hz				
	<input type="checkbox"/>	DC: 1.7~3.3V				
	<input checked="" type="checkbox"/>	Battery:3.3V				
	<input type="checkbox"/>	Adapter:				
Mounting position..... :	<input checked="" type="checkbox"/>	<i>Tabletop equipment</i>				
	<input type="checkbox"/>	<i>Wall/Ceiling mounted equipment</i>				
	<input type="checkbox"/>	<i>Floor standing equipment</i>				
	<input type="checkbox"/>	<i>Hand-held/Portable equipment</i>				
	<input type="checkbox"/>	<i>Other: RF module</i>				

1.2 Antenna Information

Antenna model / type number	N/A		
Antenna serial number	N/A		
Antenna Delivery	<input checked="" type="checkbox"/>	1TX + 1RX	
	<input type="checkbox"/>	2TX + 2RX	
	<input type="checkbox"/>	Others:	
Antenna technology	<input checked="" type="checkbox"/>	SISO	
	<input type="checkbox"/>	MIMO	<input type="checkbox"/> CDD
			<input type="checkbox"/> Beam-forming
Antenna Type	<input type="checkbox"/>	External	<input type="checkbox"/> Dipole
			<input type="checkbox"/> Sectorized
	<input checked="" type="checkbox"/>	Internal	<input checked="" type="checkbox"/> Ceramic Chip
			<input type="checkbox"/> PIFA
			<input type="checkbox"/> PCB
			<input type="checkbox"/> Others.....
Antenna Gain.....	2.13dBi		

2. RF Exposure Evaluation

2.1. Limits: KDB 447498 D04

B.2 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.

B.3 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.

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) and § 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.

B.4 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.

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).

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

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 ERP20cm is per Formula (B.1).

The 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

2.2. Test Procedure

Software provided by client enabled the EUT to transmit and receive data at lowest, middle and highest channel individually.

The temperature and related humidity: 18°C and 78% RH.

2.3. Test Result of RF Exposure Evaluation

Product	:	LocoTag
Test Item	:	RF Exposure Evaluation
Test Site	:	AC-6

B.2 Blanket 1 mW Blanket Exemption

The tune-up tolerance is 0.5 dB, the maximum ERP power we used to calculate RF exposure is 2.1dBm.

Wireless Configuration	Pmax (dBm)	Pmax (mw)	Limit (mw)
Bluetooth	2.1	1.62	1

Note: Bluetooth does not comply with B.2 Blanket 1 mW Blanket Exemption, we use B.4 SAR-based Exemption.

B.4 SAR-based Exemption

The tune-up tolerance is 0.5 dB, the maximum ERP power we used to calculate RF exposure is 2.1 dBm.

Wireless Configuration	Exposure Condition	Pmax (dBm)	Pmax (mw)	Distance (mm)	Frequency (GHz)	Calculation Result (mw)	Stand-alone Test exclusion threshold (mw)	SAR Test
Bluetooth	Body	2.1	1.62	10	2.44	1.62	10	No

Note1 : Threshold for no SAR evaluation in 10mm is 10mW. Maximum ERP Power is 1.62mW, ERP Power = Conducted Power + (Antenna Gain - 2.15dB)

Conclusion: 2.4GHz SAR was not required.

_____ The End _____