

1. RF Exposure Requirements

1.1 General Information

Client Information

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|--------------------------|--|
| Applicant: | Citadel Wallet LLC |
| Address of applicant: | 221 North Broad Street, Suite 3A, Middletown, Delaware 19709 |
| Manufacturer: | Citadel Wallet LLC |
| Address of manufacturer: | 221 North Broad Street, Suite 3A, Middletown, Delaware 19709 |

General Description of EUT:

| | |
|-------------------|------------------------------------|
| Product Name: | Citadel Hardware Wallet |
| Trade Name | / |
| Model No.: | CWHW0001 |
| Adding Model(s): | / |
| Rated Voltage: | Type-C Port:DC5V Battery:DC3.7V |
| Battery Capacity: | 0.14Wh |
| Power Adapter: | / |
| Software Version: | RF TEST FIRMWARE |
| Hardware Version: | X4 |
| FCC ID: | 2BDSO-CWHW0001 |
| Equipment Type: | Mobile device |

Technical Characteristics of EUT:

Bluetooth

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| Bluetooth Version: | V5.0 (BLE mode) |
| Frequency Range: | 2402-2480MHz |
| RF Output Power: | 1Mbps:1.58dBm (Conducted) 2Mbps:1.57dBm (Conducted) |
| Data Rate: | 1Mbps, 2Mbps |
| Modulation: | GFSK |
| Quantity of Channels: | 40 |
| Channel Separation: | 2MHz |
| Type of Antenna: | Ceramic Antenna |
| Antenna Gain: | 3.12dBi |

1.2 RF Exposure Exemption

According to §1.1307(b)(3) and KDB 447498 D04 Interim General RF Exposure Guidance v01, system operating under the provisions of this section shall be operating in a manner that the public is not exposed to radio frequency energy level in excess limit for maximum permissible exposure.

Option A: FCC Rule Part 1.1307 (b)(3)(i)(A): The available maximum time-averaged power is no more than 1mW, regardless of separation distance.

Option B: FCC Rule Part 1.1307 (b)(3)(i)(B): The available maximum time-averaged power or effective radiated power (ERP), whichever is greater, is less than or equal to the threshold P_{th} (mW) described in the following formula. P_{th} is given by:

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

Where

$$x = -\log_{10} \left(\frac{60}{ERP_{20 \text{ cm}} \sqrt{f}} \right) \text{ and } f \text{ is in GHz;}$$

and

$$ERP_{20 \text{ cm}} \text{ (mW)} = \begin{cases} 2040f & 0.3 \text{ GHz} \leq f < 1.5 \text{ GHz} \\ 3060 & 1.5 \text{ GHz} \leq f \leq 6 \text{ GHz} \end{cases}$$

d = the separation distance (cm);

Option C: FCC Rule Part 1.1307 (b)(3)(i)(C): 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. R must be at least $\lambda/2\pi$, where λ is the free-space operating wavelength in meters.

| Single RF Sources Subject to Routine Environmental Evaluation | |
|---|-----------------------|
| RF Source frequency (MHz) | Threshold ERP (watts) |
| 0.3-1.34 | $1,920 R^2$ |
| 1.34-30 | $3,450 R^2/f^2$ |
| 30-300 | $3.83 R^2$ |
| 300-1,500 | $0.0128 R^2 f$ |
| 1,500-100,000 | $19.2 R^2$ |

For Multiple RF sources: FCC Rule Part 1.1307(b)(3)(ii):

- (A) 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).
- (B) 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.

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

1.3 Calculated Result

| Radio Access Technology | Prediction Frequency (MHz) | Output Power (dBm) | Antenna Gain (dBi) | Duty Cycle (%) | Tune-Up Time-Averaged Power (dBm) | ERP (dBm) |
|-------------------------|----------------------------|--------------------|--------------------|----------------|-----------------------------------|-----------|
| Bluetooth | 2402 | 1.58 | 3.12 | 100 | 2.00 | 2.97 |

| Frequency (MHz) | Option | Min. Distance (cm) | Max. Power (dBm) (mW) | | Exposure Limit (mW) | Ratio | Result Pass/Fail |
|-----------------|--------|--------------------|-----------------------|------|---------------------|-------|------------------|
| 2402 | B | 0.5 | 2.97 | 1.98 | 2.788 | 0.71 | Pass |

Note: 1. Time-Averaged Power=Output Power * Duty Cycle; ERP= Time-Averaged Power+ Antenna gain-2.15dB

2. Option A, B and C refers as clause 1.2.

3. For option B, Max (time-averaged power, effective radiated power (ERP)) converts to Max. Power. For option C, ERP converts to Max. Power;

4. For option B, P_{th} (mW) converts to Exposure Limit (mW); For option C, ERP (W) converts to Exposure Limit (mW).

5. Ratio= Tune-Up ERP (mW)/ Exposure Limit (mW)

Mode for Simultaneous Multi-band Transmission:

| Radio Access Technology | Ratio 1 | Ratio 2 | Simultaneous Ratio | Limit | Result Pass/Fail |
|-------------------------|---------|---------|--------------------|-------|------------------|
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Result: Pass