HEARING AID COMPATIBILITY RF EMISSIONS TEST REPORT

FCC ID	:	**IHDT56AB3**
Equipment	:	**Mobile Cellular Phone**
Brand Name	:	**Motorola**
Model Name	:	**XT2201-4**
M-Rating	:	**M4**
Applicant	:	**Motorola Mobility LLC** **222 W, Merchandise Mart Plaza, Chicago IL 60654 USA**
Manufacturer	:	**Motorola Mobility LLC** **222 W, Merchandise Mart Plaza, Chicago IL 60654 USA**
Standard	:	**FCC 47 CFR §20.19** **ANSI C63.19-2011**

We, Sporton International Inc. (Kunshan) would like to declare that the tested sample has been evaluated in accordance with the test procedures and has been in compliance with the applicable technical standards.

The test results in this report apply exclusively to the tested model / sample. Without written approval of Sporton International Inc. (Kunshan), the test report shall not be reproduced except in full.

Si Zhang

Approved by: Si Zhang

ACCREDITED Cert #5145.02

Sporton International Inc. (Kunshan)
No. 1098, Pengxi North Road, Kunshan Economic Development Zone Jiangsu Province 215300
People's Republic of China

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History of this test report

Report No.	Version	Description	Issued Date
HA192317-13A	Rev. 01	Initial issue of report	May 07, 2022

1. General Information

Product Feature & Specification	
Applicant Name	Motorola Mobility LLC
Equipment Name	Mobile Cellular Phone
Brand Name	Motorola
Model Name	XT2201-4
IMEI Code	357193870008317
FCC ID	IHDT56AB3
HW	DVT2
SW	S1SH32.10
EUT Stage	Identical Prototype
Frequency Band	GSM850: 824 MHz ~ 849 MHz GSM1900: 1850 MHz ~ 1910 MHz WCDMA Band II: 1850 MHz ~ 1910 MHz WCDMA Band V: 824 MHz ~ 849 MHz LTE Band 2: 1850 MHz ~ 1910 MHz LTE Band 4: 1710 MHz ~ 1755 MHz LTE Band 5: 824 MHz ~ 849 MHz LTE Band 7: 2500 MHz ~ 2570 MHz LTE Band 12: 699 MHz ~ 716 MHz LTE Band 13: 777 MHz ~ 787 MHz LTE Band 48: 3550 MHz ~ 3700 MHz LTE Band 66: 1710 MHz ~ 1780 MHz 5G NR n2: 1850 MHz ~ 1910 MHz 5G NR n5: 824 MHz ~ 849 MHz 5G NR n66: 1710 MHz ~ 1780 MHz 5G NR n48 : 3550 MHz ~ 3700 MHz 5G NR n77: 3450 MHz ~ 3550 MHz, 3700 MHz ~ 3980 MHz 5G NR n78: 3450 MHz ~ 3550 MHz, 3700 MHz ~ 3800 MHz 5G NR n260 : 37 GHz~40 GHz 5G NR n261 : 27.5 GHz~28.35 GHz WLAN 2.4GHz Band: 2412 MHz ~ 2462 MHz WLAN 5.2GHz Band: 5180 MHz ~ 5240 MHz WLAN 5.3GHz Band: 5260 MHz ~ 5320 MHz WLAN 5.5GHz Band: 5500 MHz ~ 5720 MHz WLAN 5.8GHz Band: 5745 MHz ~ 5825 MHz WLAN 6E U-NII-5: 5925 MHz ~ 6425 MHz WLAN 6E U-NII-6: 6425 MHz ~ 6525 MHz WLAN 6E U-NII-7: 6525 MHz ~ 6875 MHz WLAN 6E U-NII-8: 6875 MHz ~ 7125 MHz Bluetooth: 2402 MHz ~ 2480 MHz WPC: 110 kHz ~ 148 kHz NFC: 13.56 MHz
Mode	GSM/GPRS/EGPRS RMC/AMR 12.2Kbps HSDPA HSUPA DC-HSDPA HSPA+(16QAM uplink is not supported) LTE: QPSK, 16QAM, 64QAM, 256QAM 5G NR : CP-OFDM / DFT-s-OFDM, PI/2 BPSK, QPSK, 16QAM, 64QAM, 256QAM WLAN 2.4GHz 802.11b/g/n HT20/HT40 WLAN 2.4GHz 802.11ax HE20/HE40 WLAN 5GHz 802.11a/n HT20/HT40 WLAN 5GHz 802.11ac/ax VHT20/VHT40/VHT80/VHT160/HE20/HE40/HE80/HE160 WLAN 6GHz 802.11a WLAN 6GHz 802.11ax HE20/HE40/HE80/HE160 Bluetooth BR/EDR/LE WPC: ASK NFC: ASK

2. Testing Location

Sporton International Inc. (Kunshan) is accredited to ISO/IEC 17025:2017 by American Association for Laboratory Accreditation with Certificate Number 5145.02.

Testing Laboratory			
Test Firm	Sporton International Inc. (Kunshan)		
Test Site Location	No. 1098, Pengxi North Road, Kunshan Economic Development Zone Jiangsu Province 215300 People's Republic of China TEL : +86-512-57900158 FAX : +86-512-57900958		
Test Site No.	Sporton Site No.	FCC Designation No.	FCC Test Firm Registration No.
	SAR01-KS	CN1257	314309

3. Applied Standards

- FCC CFR47 Part 20.19
- ANSI C63.19-2011
- FCC KDB 285076 D01 HAC Guidance v05r01
- FCC KDB 285076 D03 HAC FAQ v01r04

4. RF Audio Interference Level

FCC wireless hearing aid compatibility rules ensure that consumers with hearing loss are able to access wireless communications services through a wide selection of handsets without experiencing disabling radio frequency (RF) interference or other technical obstacles.
To define and measure the hearing aid compatibility of handsets, in CFR47 part 20.19 ANSI C63.19 is referenced. A handset is considered hearing aid-compatible for acoustic coupling if it meets a rating of at least M3 under ANSI C63.19, and A handset is considered hearing aid compatible for inductive coupling if it meets a rating of at least T3. According to ANSI C63.19 2011 version, for acoustic coupling, the RF electric field emissions of wireless communication devices should be measured and rated according to the emission level as below.

Emission Categories	E-field emissions	
	<960Mhz	>960Mhz
M1	50 to 55 dB (V/m)	40 to 45 dB (V/m)
M2	45 to 50 dB (V/m)	35 to 40 dB (V/m)
M3	40 to 45 dB (V/m)	30 to 35 dB (V/m)
M4	<40 dB (V/m)	<30 dB (V/m)

Table 4.1 Telephone near-field categories in linear units

5. Air Interface and Operating Mode

Air Interface	Band MHz	Type	C63.19 Tested	Simultaneous Transmitter	Name of Voice Service	Power Reduction
GSM	GSM850	VO	Yes	WLAN, BT	CMRS Voice	No
	GSM1900			WLAN, BT		No
	EDGE850	VD	Yes	WLAN, BT	Google Duo	No
	EDGE1900			WLAN, BT		
WCDMA	Band II	VO	No(1)	WLAN, BT	CMRS Voice	No
	Band V			WLAN, BT		No
	HSPA	VD	No(1)	WLAN, BT	Google Duo	No
LTE (FDD)	Band 2	VD	No(1)	5G NR, WLAN, BT	VoLTE / Google Duo	No
	Band 4			5G NR, WLAN, BT		No
	Band 5			5G NR, WLAN, BT		No
	Band 7			5G NR, WLAN, BT		No
	Band 12			5G NR, WLAN, BT		No
	Band 13			5G NR, WLAN, BT		No
	Band 66			5G NR, WLAN, BT		No
LTE (TDD)	Band 48	VD	Yes	5G NR, WLAN, BT	VoLTE / Google Duo	No
5G NR (FDD)	n2	VD	No(1)	LTE, WLAN, BT	VoNR / Google Duo	No
	n5			LTE, WLAN, BT		No
	n66			LTE, WLAN, BT		No
5G NR (TDD)	n77	VD	No(1)	LTE, WLAN, BT	VoNR / Google Duo	No
	n78			LTE, WLAN, BT		No
	n48			LTE, WLAN, BT		No
Wi-Fi	2450	VD	Yes	GSM,WCDMA,LTE,5G NR, WLAN 5GHz, WLAN 6GHz	VoWiFi / Google Duo	No
	5200	VD	Yes	GSM,WCDMA,LTE,5G NR, BT, WLAN 2.4GHz		No
	5300			GSM,WCDMA,LTE,5G NR, BT, WLAN 2.4GHz		No
	5500			GSM,WCDMA,LTE,5G NR, BT, WLAN 2.4GHz		No
	5800			GSM,WCDMA,LTE,5G NR, BT, WLAN 2.4GHz		No
	U-NII-5	VD	No(3)	GSM,WCDMA,LTE,5G NR, BT, WLAN 2.4GHz	Google Duo	No
	U-NII-6			GSM,WCDMA,LTE,5G NR, BT, WLAN 2.4GHz		No
	U-NII-7			GSM,WCDMA,LTE,5G NR, BT, WLAN 2.4GHz		No
	U-NII-8			GSM,WCDMA,LTE,5G NR, BT, WLAN 2.4GHz		No
BT	2450	DT	No	GSM,WCDMA,LTE,5G NR, WLAN 5GHz, WLAN 6GHz	NA	No

Type Transport:
VO= Voice only
DT= Digital Transport only (no voice)
VD= CMRS and IP Voice Service over Digital Transport

Remark:
1. The air interface is exempted from testing by low power exemption that its average antenna input power plus its MIF is ≤17 dBm, and is rated as M4.
2. The WiFi 6E U-NII-5/6/7/8 are currently outside the scope of ANSI 63.19 and FCC HAC regulations therefore, they were not evaluated.
3. The 5GNR n260 and n261 are currently outside the scope of ANSI 63.19 and FCC HAC regulations therefore, they were not evaluated.
4. This is a variant report for XT2201-4, the difference between current project and previous project is enabled 5G NR n48 by software. So according to the difference, only added 5G NR n48 evaluation, and other bands test results are leverage from original report which can be referred to Sporton Report Number HA192317-02A.

6. Modulation Interference Factor

The HAC Standard ANSI C63.19-2011 defines a new scaling using the Modulation Interference Factor (MIF). For any specific fixed and repeatable modulated signal, a modulation interference factor (MIF, expressed in dB) may be developed that relates its interference potential to its steady-state rms signal level or average power level. This factor is a function only of the audio-frequency amplitude modulation characteristics of the signal and is the same for field-strength and conducted power measurements. It is important to emphasize that the MIF is valid only for a specific repeatable audio-frequency amplitude modulation characteristic. Any change in modulation characteristic requires determination and application of a new MIF

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 C63.19-2011.

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. Probe Modulation Response (PMR) calibration linearizes the probe response over its dynamic range for specific modulations which are characterized by their UID and result in an uncertainty specified in the probe calibration certificate. The MIF is characteristic for a given waveform envelope and can be used as a constant conversion factor if the probe has been PMR calibrated.

The evaluation method for 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 scaled 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 alliteratively be determined through analysis and simulation, because it is constant 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 it is automatically applied.

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

1. 0.2 dB for MIF: -7 to +5 dB
2. 0.5 dB for MIF: -13 to +11 dB
3. 1 dB for MIF: > -20 dB

MIF values applied in this test report were provided by the HAC equipment provider of SPEAG, and the worst values for all air interface are listed below to be determine the Low-power Exemption.

UID	Communication System Name	MIF(dB)
10769	5G NR (CP-OFDM, 1 RB, 15 MHz, QPSK, 15 kHz)	-12.08

7. Low-power Exemption

<Max Tune-up Limit>

<Ant2>

Frequency Band		Average Power (dBm)
5G NR TDD	n48	24.00

<Ant3>

Frequency Band		Average Power (dBm)
5G NR TDD	n48	24.00

<Ant7>

Frequency Band		Average Power (dBm)
5G NR TDD	n48	24.00

<Ant8>

Frequency Band		Average Power (dBm)
5G NR TDD	n48	20.30

<Low Power Exemption>

<Ant2>

Air Interface	Max Average Antenna Input Power (dBm)	Worst Case MIF (dB)	Power + MIF(dB)	C63.19 test required
5G FR1 - TDD	24.00	-12.08	11.92	No

<Ant3>

Air Interface	Max Average Antenna Input Power (dBm)	Worst Case MIF (dB)	Power + MIF(dB)	C63.19 test required
5G FR1 - TDD	24.00	-12.08	11.92	No

<Ant7>

Air Interface	Max Average Antenna Input Power (dBm)	Worst Case MIF (dB)	Power + MIF(dB)	C63.19 test required
5G FR1 - TDD	24.00	-12.08	11.92	No

<Ant8>

Air Interface	Max Average Antenna Input Power (dBm)	Worst Case MIF (dB)	Power + MIF(dB)	C63.19 test required
5G NR - TDD	20.30	-12.08	8.22	No

General Note:

1. According to ANSI C63.19 2011-version, for the 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.
2. HAC RF rating is M4 for the air interface which meets the low power exemption.

8. References

[1] ANSI C63.19-2011, “American National Standard for Methods of Measurement of Compatibility between Wireless Communications Devices and Hearing Aids”, 27 May 2011.

[2] FCC KDB 285076 D01v05r01, “Equipment Authorization Guidance for Hearing Aid Compatibility”, Apr 06, 2020

[3] FCC KDB 285076 D03v01r04, “Hearing aid compatibility frequently asked questions”, Apr 20, 2021

[4] SPEAG DASY System Handbook

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Appendix A. UID specifications for HAC RFE

The UID_Summary are shown as follows.

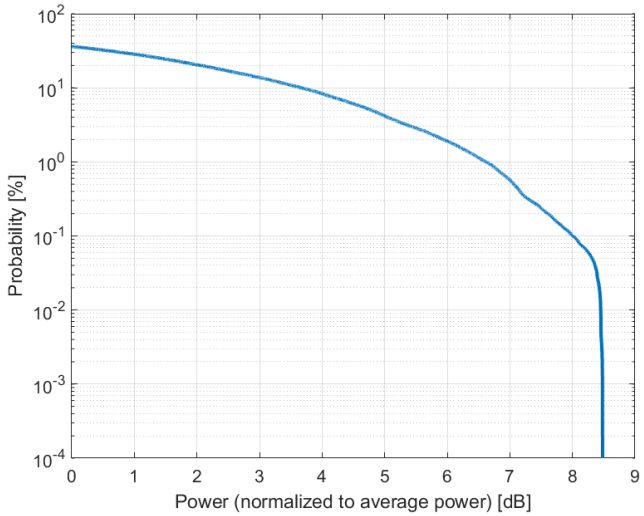
Calibration Laboratory of
Schmid & Partner
Engineering AG
Zeughausstrasse 43, 8004 Zurich, Switzerland

Name:	**5G NR (CP-OFDM, 1 RB, 15 MHz, QPSK, 15 kHz)**
Group:	5G NR FR1 TDD
UID:	10769-AAD
PAR: [1]	**8.01 dB**
MIF: [2]	**-12.08 dB**
Standard Reference:	SPEAG
Category:	Random amplitude modulation
Modulation:	QPSK
Frequency Band:	Band n34 (2010 - 2025 MHz) Band n38 (2570 - 2620 MHz) Band n39 (1880 - 1920 MHz) Band n40 (2300 - 2400 MHz) Band n41 (2496 - 2690 MHz) Band n48 (3550 - 3700 MHz) Band n50 (1432 - 1517 MHz) Band n77 (3300 - 4200 MHz) Band n78 (3300 - 3800 MHz) Band n90 (2496 - 2690 MHz) Validation band (0.0 - 6000.0 MHz)
Detailed Specification:	Multiplexing Scheme: CP-OFDM Modulation Scheme: QPSK Subcarrier Spacing: 15 kHz Number RBs: 1 Slot Format Index: 1 Data Type: PN9
Bandwidth:	15.0 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).

Calibration Laboratory of
Schmid & Partner
Engineering AG
Zeughausstrasse 43, 8004 Zurich, Switzerland



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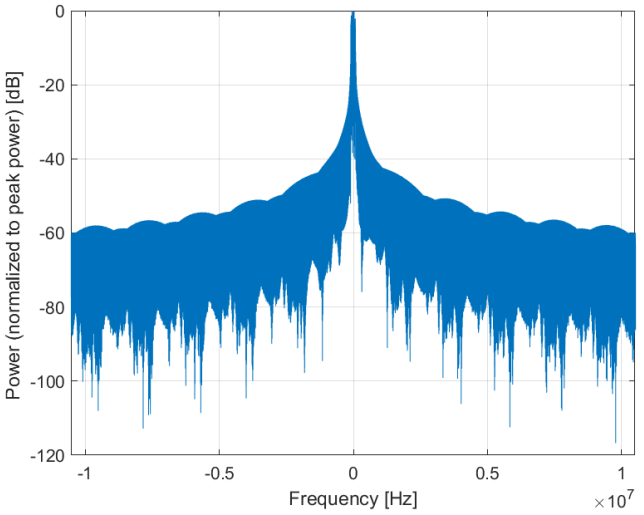
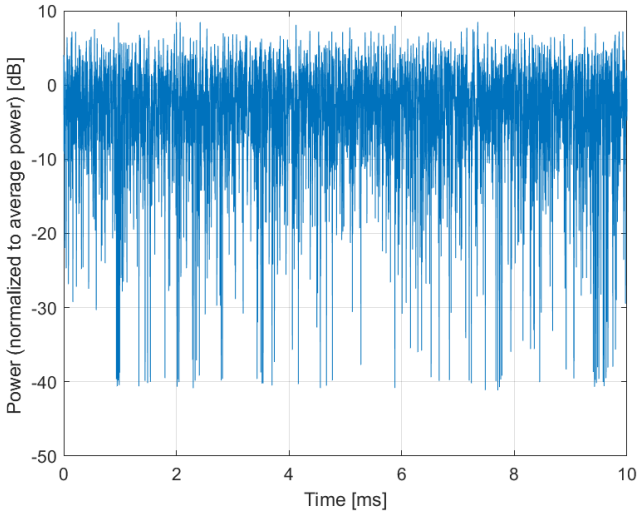


Frequency Domain



Time Domain