# HEARING AID COMPATIBILITY RF EMISSIONS TEST REPORT

FCC ID : IHDT56AL6

**Equipment**: Mobile Cellular Phone

**Brand Name: Motorola** 

Model Name: XT2303-1, XT2303-2

M-Rating : M3

Applicant : Motorola Mobility LLC

222 W, Merchandise Mart Plaza, Chicago IL 60654 USA

Report No.: HA320205A

Manufacturer : Motorola Mobility LLC

222 W, Merchandise Mart Plaza, Chicago IL 60654 USA

Cert #5145.02

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.

Approved by: Si Zhang

Si Zhang

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.: HA320205A

Report No.	Version	Description	Issued Date
HA320205A	Rev. 01	Initial issue of report	Mar. 27, 2023

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## 1. General Information

Product Feature & Specification						
Applicant Name	Motorola Mobility LLC					
Equipment Name	Mobile Cellular Phone					
Brand Name	Motorola					
Model Name	XT2303-1, XT2303-2					
IMEI Code	IMEI 1: 358543770016852					
FCC ID	IMEI 2: 358543770016860 IHDT56AL6					
HW	DVT2					
SW	TTL33.38					
EUT Stage	Identical Prototype					
Date Tested	2023/2/27 ~ 2023/2/28					
Frequency Band	GSM850: 824 MHz ~ 849 MHz GSM1900: 1850 MHz ~ 1910 MHz WCDMA Band II: 1850 MHz ~ 1910 MHz WCDMA Band II: 1850 MHz ~ 1910 MHz WCDMA Band IV: 1710 MHz ~ 1755 MHz WCDMA Band V: 242 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 5: 824 MHz ~ 849 MHz LTE Band 7: 2500 MHz ~ 2570 MHz LTE Band 13: 777 MHz ~ 787 MHz LTE Band 13: 777 MHz ~ 787 MHz LTE Band 17: 704 MHz ~ 716 MHz LTE Band 17: 704 MHz ~ 716 MHz LTE Band 38: 2570 MHz ~ 2620 MHz LTE Band 38: 2570 MHz ~ 2690 MHz LTE Band 41: 2496 MHz ~ 2690 MHz LTE Band 42: 3450 MHz ~ 3550MHz 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 n66: 1710 MHz ~ 2570 MHz 5G NR n73: 2500 MHz ~ 2570 MHz 5G NR n73: 2500 MHz ~ 2620 MHz 5G NR n73: 3700 MHz ~ 2620 MHz 5G NR n84: 2496 MHz ~ 2690 MHz 5G NR n78: 3700 MHz ~ 2800 MHz 5G NR n78: 3700 MHz ~ 2800 MHz ULAN 2.4GHz Band: 2412 MHz ~ 2462 MHz WLAN 5.3GHz Band: 5260 MHz ~ 5240 MHz WLAN 5.3GHz Band: 5500 MHz ~ 5240 MHz WLAN 5.3GHz Band: 5500 MHz ~ 5220 MHz WLAN 5.8GHz Band: 5500 MHz ~ 5720 MHz WLAN 5.8GHz Band: 5500 MHz ~ 5220 MHz WLAN 5.8GHz Band: 5500 MHz ~ 5220 MHz WLAN 5.8GHz Band: 5745 MHz ~ 5825 MHz Bluetooth: 2402 MHz ~ 2480 MHz NFC: 13.58 MHz					
Mode	GSM/GPRS/EGPRS RMC/AMR 12.2Kbps HSDPA HSUPA DC-HSDPA HSPA+(16QAM uplink is not supported) LTE: QPSK, 16QAM, 64QAM 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 802.11a/n HT20/HE40 WLAN 5GHz 802.11a/n HT20/HT40 WLAN 5GHz 802.11a/n HT20/HT40 WLAN 5GHz 802.11ac/ax VHT20/VHT40/VHT80/HE20/HE40/HE80 Bluetooth BR/EDR/LE NFC: ASK					

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The two model names: XT2303-1 is USIM(DS/SS) sample and XT2303-2 is eSIM + USIM(SS) sample, they are only SIM Slot difference, since the difference does not affect hearing-aid compliance, so only choose XT2303-1 sample to full test, XT2303-2 sample is not tested.

## 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.

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Testing Laboratory						
Test Firm	Sporton International Inc.	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					
Took Site No	Sporton Site No.	FCC Designation No.	FCC Test Firm Registration No.			
Test Site No.	SAR01-KS	CN1257	314309			

## 3. Applied Standards

- FCC CFR47 Part 20.19
- · ANSI C63.19-2011
- FCC KDB 285076 D01 HAC Guidance v06r02
- FCC KDB 285076 D03 HAC FAQ v01r06

## 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.

Emissian Catagorias	E-field emissions			
Emission Categories	<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)		
М3	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

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## 5. Air Interface and Operating Mode

Air Interface	Band MHz	Туре	C63.19 Tested	Simultaneous Transmitter	Name of Voice Service	Power Reduction	
	GSM850	VO	Yes	WLAN, BT	CMRS Voice	No	
GSM	GSM1900	VO	163	WLAN, BT	CIVILO VOICE	No	
GSIVI	EDGE850	VD	Yes	WLAN, BT	Google Duo	No	
	EDGE1900	V D	100	WLAN, BT	google Fi	140	
	Band II			WLAN, BT		No	
	Band IV	VO	No <sup>(1)</sup>	WLAN, BT	CMRS Voice	No	
WCDMA	Band V			WLAN, BT		No	
	HSPA	VD	No <sup>(1)</sup>	WLAN, BT	Google Duo google Fi	No	
	Band 2			5G NR, WLAN, BT		No	
	Band 4			5G NR, WLAN, BT		No	
	Band 5			5G NR, WLAN, BT		No	
LTE	Band 7			5G NR, WLAN, BT	VoLTE	No	
LTE (FDD)	Band 12	VD	No <sup>(1)</sup>	5G NR, WLAN, BT	Google Duo	No	
(100)	Band 13			5G NR, WLAN, BT	google Fi	No	
	Band 17			5G NR, WLAN, BT		No	
	Band 26			5G NR, WLAN, BT			No
	Band 66			5G NR, WLAN, BT		No	
	Band 38			5G NR, WLAN, BT	VoLTE	No	
LTE (TDD)	Band 41	Band 41 VD	Yes	5G NR, WLAN, BT	/ - Google Duo google Fi	No	
(100)	Band 42			5G NR, WLAN, BT		No	
	n2	n2		LTE, WLAN, BT	VoNR	No	
5G NR	n5	VD	No <sup>(1)</sup>	LTE, WLAN, BT	/	No	
(FDD)	n7	VD	No	LTE, WLAN, BT Google Du		No	
	n66			LTE, WLAN, BT	google Fi	No	
	n38			LTE, WLAN, BT	VoNR	No	
5G NR	n41	VD	No <sup>(1)</sup>	LTE, WLAN, BT	/	No	
(TDD)	n77	VD	INO.	LTE, WLAN, BT	Google Duo	No	
	n78			LTE, WLAN, BT	google Fi	No	
	2450	VD	Yes	GSM,WCDMA,LTE,5G NR, WLAN 5GHz,BT		No	
	5200			GSM,WCDMA,LTE,5G NR, BT, WLAN 2.4GHz	VoWiFi	No	
Wi-Fi	5300	VD	No <sup>(1)</sup>	GSM,WCDMA,LTE,5G NR, BT, WLAN 2.4GHz	Google Duo	No	
	5500	VD	No''	GSM,WCDMA,LTE,5G NR, BT, WLAN 2.4GHz google Fi		No	
	5800	5800		GSM,WCDMA,LTE,5G NR, BT, WLAN 2.4GHz		No	
ВТ	2450	DT	No	GSM,WCDMA,LTE,5G NR, WLAN 5GHz, WLAN 2.4GHz	NA	No	

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Type Transport: VO= Voice only

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

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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

The device have similar frequency in some LTE bands: LTE B38/41, since the supported frequency spans for the smaller LTE bands are completely cover by the larger LTE bands, therefore, only larger LTE bands were required to be tested for hearing-aid compliance.

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## 6. Measurement System Specification

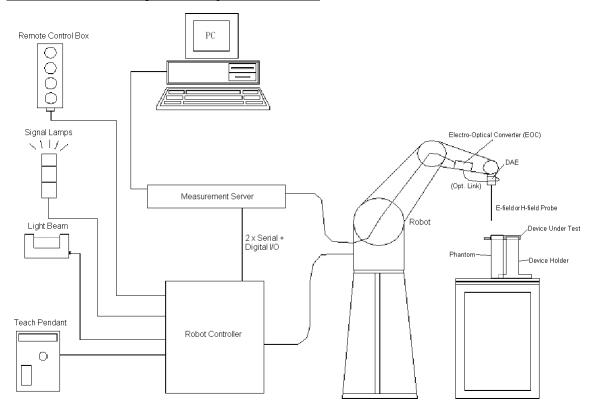


Fig 6.1 System Configurations

#### 6.1 E-Field Probe System

## E-Field Probe Specification <EF3DV3>

Construction	One dipole parallel, two dipoles normal to probe axis	
	Built-in shielding against static charges	
Calibration	In air from 30 MHz to 6.0 GHz	
	(absolute accuracy ±6.0%, k=2)	
Frequency	30 MHz to 6 GHz;	1
	Linearity: ± 2.0 dB (100 MHz to 3 GHz)	
Directivity	± 0.2 dB in air (rotation around probe axis)	
	± 0.4 dB in air (rotation normal to probe axis)	
Dynamic Range	2 V/m to 1000 V/m	
	(M3 or better device readings fall well below diode	17/4
	compression point)	
Linearity	± 0.2 dB	
Dimensions	Overall length: 337 mm (Tip: 20 mm)	
	Tip diameter: 4 mm (Body: 12 mm)	
	Distance from probe tip to dipole centers: 1.5 mm	



#### Probe Tip Description:

HAC field measurements take place in the close near field with high gradients. Increasing the measuring distance from the source will generally decrease the measured field values (in case of the validation dipole approx. 10 %per mm).

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#### 6.2 Data Storage and Evaluation

The DASY software stores the assessed data from the data acquisition electronics as raw data (in microvolt readings from the probe sensors), together with all the necessary software parameters for the data evaluation (probe calibration data, and device frequency and modulation data) in measurement files.

**Probe parameters**: - Sensitivity Norm<sub>i</sub>, a<sub>i0</sub>, a<sub>i1</sub>, a<sub>i2</sub>

Conversion factor ConvF<sub>i</sub>
 Diode compression point dcp<sub>i</sub>

**Device parameters**: - Frequency f

- Crest factor cf

**Media parameters**: - Conductivity σ

- Density ρ

The formula for each channel can be given as :

$$V_i = U_i + U_i^2 \cdot \frac{cf}{dcp_i}$$

with  $V_i$  = compensated signal of channel i, (i = x, y, z)

 $U_i$  = input signal of channel i, (i = x, y, z)

cf = crest factor of exciting field (DASY parameter)

dcp<sub>i</sub> = diode compression point (DASY parameter)

From the compensated input signals, the primary field data for each channel can be evaluated:

$$\text{E-field Probes}: E_i = \sqrt{\frac{V_i}{Norm_i \cdot ConvF}}$$

with  $V_i$  = compensated signal of channel i, (i = x, y, z)

Norm<sub>i</sub> = sensor sensitivity of channel i, (i = x, y, z),  $\mu V/(V/m)^2$  for E-field Probes

ConvF = sensitivity enhancement in solution

f = carrier frequency [GHz]

E<sub>i</sub> = electric field strength of channel i in V/m

The RSS value of the field components gives the total field strength (Hermitian magnitude):

$$\mathbf{E_{tot}} = \sqrt{\mathbf{E_x^2 + E_y^2 + E_z^2}}$$

The primary field data are used to calculate the derived field units.

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#### 7. RF Emissions Test Procedure

Referenced from ANSI C63.19 -2011 section 5.5.1

a. Confirm the proper operation of the field probe, probe measurement system, and other instrumentation and the positioning system.

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- b. Position the WD in its intended test position.
- c. Set the WD to transmit a fixed and repeatable combination of signal power and modulation characteristic that is representative of the worst case (highest interference potential) encountered in normal use. Transiently occurring start-up, changeover, or termination conditions, or other operations likely to occur less than 1% of the time during normal operation, may be excluded from consideration.
- d. The center sub-grid shall be centered on the T-Coil mode perpendicular measurement point or the acoustic output, as appropriate. Locate the field probe at the initial test position in the 50 mm by 50 mm grid, which is contained in the measurement plane, refer to illustrated in Figure 8.2. If the field alignment method is used, align the probe for maximum field reception.
- e. Record the reading at the output of the measurement system.
- f. Scan the entire 50 mm by 50 mm region in equality spaced increments and record the reading at each measurement point, The distance between measurement points shall be sufficient to assure the identification of the maximum reading.
- g. Identify the five contiguous sub-grids around the center sub-grid whose maximum reading is the lowest of all available choices. This eliminates the three sub-grids with the maximum readings. Thus, the six areas to be used to determine the WD's highest emissions are identified.
- h. Identify the maximum reading within the non-excluded sub-grids identified in step g).
- i. Indirect measurement method
- j. The RF audio interference level in dB (V/m) is obtained by adding the MIF (in dB) to the maximum steady-state rms field-strength reading, in dB (V/m)
- k. Compare this RF audio interference level with the categories in ANSI C63.19-2011 clause 8 and record the resulting WD category rating.
- I. For the T-Coil perpendicular measurement location is ≥5.0 mm from the center of the acoustic output, then two different 50 mm by 50 mm areas may need to be scanned, the first for the microphone mode assessment and the second for the T-Coil assessment.
- m. The second for the T-Coil assessment, with the grid shifted so that it is centered on the perpendicular measurement point. Record the WD category rating.

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#### **Test Instructions**

- Confirm proper operation of probes and instrumentation
- > Position WD
- > Configure WD TX operation

Per 5.4.1.2 (1-3)

- > Initialize field probe
- Scan Area

Per 5.4.1.2 (4-6)

- Identify exclusion area.
- Rescan or reanalyze open area to determine maximum
- Direct method: Record RF Audio Interference Level, in dB(V/m)
- Indirect method: Add the MIF to the maximum steady state rms field strength and record RF Audio Interference Level, in dB(V/m)

Per 5.4.1.2 (7-9) & 5.4.1.3

Identify and record the category

Per 5.4.1.2 (9-10)

Figure 8.1 RF Emissions Flow Chart





Fig 8.2 EUT reference and plane for HAC RF emission measurements

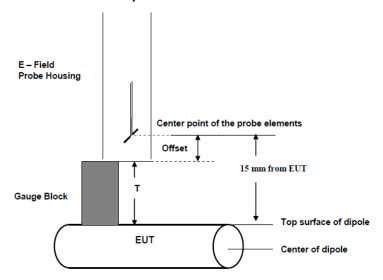


Fig. 8.3 Gauge block with E-field probe

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## 8. Test Equipment List

Manufacturer	Name of Equipment	Type/Medal	0	Calibration		
Manufacturer	Name of Equipment	Type/Model	Serial Number	Last Cal.	Due Date	
SPEAG	SPEAG 835MHz Calibration Dipole		1171	2022/3/1	2023/2/28	
SPEAG	1880MHz Calibration Dipole	CD1880V3	1155	2022/3/1	2023/2/28	
SPEAG	2450MHz Calibration Dipole	CD2450V3	1155	2021/6/16	2024/6/15	
SPEAG	2600Mhz Calibration Dipole	CD2600V3	1030	2022/6/29	2023/6/28	
SPEAG	3500Mhz Calibration Dipole	CD3500V3	1009	2022/3/3	2023/2/28	
SPEAG	Data Acquisition Electronics	DAE4	1650	2022/8/5	2023/8/4	
SPEAG	Isotropic E-Field Probe	EF3DV3	4050	2023/1/24	2024/1/23	
SPEAG	Test Arch Phantom	N/A	N/A	NCR	NCR	
SPEAG	Phone Positioner	N/A	N/A	NCR	NCR	
R&S	Base Station	CMW500	143030	2022/7/14	2023/7/13	
Anritsu	Vector Signal Generator	MG3710A	6201682672	2023/1/5	2024/1/4	
Rohde & Schwarz	Power Meter	NRVD	102081	2022/7/14	2023/7/13	
Rohde & Schwarz	Power Sensor	NRV-Z5	100538	2022/7/14	2023/7/13	
Rohde & Schwarz	Power Sensor	NRV-Z5	100539	2022/7/14	2023/7/13	
Rohde & Schwarz	Spectrum Analyzer	FSV7	101631	2022/10/12	2023/10/11	
Testo	Thermo-Hygrometer	608-H1	1241332126	2023/1/5	2024/1/4	
MCL	Attenuation1	BW-S10W5+	N/A	NCR	NCR	
MCL	Attenuation2	BW-S10W5+	N/A	NCR	NCR	
MCL	Attenuation3	BW-S10W5+	N/A	NCR	NCR	
BONN	POWER AMPLIFIER	BLMA 0830-3	087193A	NCR	NCR	
BONN	POWER AMPLIFIER	BLMA 2060-2	087193B	NCR	NCR	
Agilent	Dual Directional Coupler	778D	20500	NCR	NCR	
Agilent	Dual Directional Coupler	11691D	MY48151020	NCR	NCR	

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#### Note:

- 1.
- NCR: "No-Calibration Required"
  Referring to KDB 865664 D01v01r04, the dipole calibration interval can be extended to 3 years with justification. The dipoles are also not physically damaged, or repaired during the interval.
- The justification data of dipole can be found in appendix C. The return loss is < -20dB, within 20% of prior calibration, the impedance is within 5 ohm of prior calibration.

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#### 9. Measurement System Validation

Each DASY system is equipped with one or more system validation kits. These units, together with the predefined measurement procedures within the DASY software, enable the user to conduct the system performance check and system validation. System validation kit includes a dipole, tripod holder to fix it underneath the test Arch and a corresponding distance holder.

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The system performance check verifies that the system operates within its specifications. System and operator errors can be detected and corrected. It is recommended that the system performance check be performed prior to any usage of the system in order to guarantee reproducible results. The system performance check uses normal HAC measurements in a simplified setup with a well characterized source. This setup was selected to give a high sensitivity to all parameters that might fail or vary over time. The system check does not intend to replace the calibration of the components, but indicates situations where the system uncertainty is exceeded due to drift or failure.

#### <Test Setup>

- 1. In the simplified setup for system evaluation, the EUT is replaced by a calibrated dipole and the power source is replaced by a continuous wave which comes from a signal generator.
- 2. The center point of the probe element(s) is 15mm from the closest surface of the dipole elements.
- 3. The calibrated dipole must be placed beneath the arch phantom. The equipment setup is shown below:
- 4. The output power on dipole port must be calibrated to 20dBm (100mW) before dipole is connected.

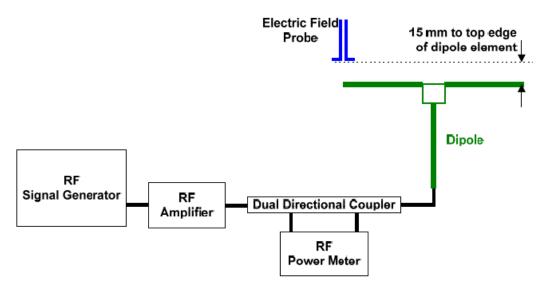


Fig. 7.1 Setup Diagram

#### <Validation Results>

Comparing to the original E-field value provided by SPEAG, the verification data should be within its specification of 18 %. Table 6.1 shows the target value and measured value. The table below indicates the system performance check can meet the variation criterion and the plots can be referred to appendix A of this report.

Deviation = ((Average E-field Value) - (Target value)) / (Target value) \* 100%

Frequency (MHz)	Input Power (dBm)	Target Value (V/m)	E-Field 1 (V/m)	E-Field 2 (V/m)	Average Value (V/m)	Deviation (%)	Date
835	20	107.7	110.1	96.5	103.3	-4.09	2023/2/27
1880	20	85.1	86.17	84.53	85.35	0.29	2023/2/27
2450	20	85.1	94.86	93.06	93.96	10.41	2023/2/27
2600	20	86	85.64	81.42	83.53	-2.87	2023/2/28
3500	20	83.4	92.19	90.33	91.26	9.42	2023/2/28

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#### 10. 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

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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)
10021	GSM-FDD(TDMA,GMSK)	3.63
10025	EDGE-FDD (TDMA, 8PSK, TN 0)	3.75
10460	UMTS-FDD(WCDMA, AMR)	-25.43
10225	UMTS-FDD (HSPA+)	-20.39
10170	LTE-FDD(SC-FDMA,1RB,20MHz,16-QAM)	-9.76
10173	LTE-TDD (SC-FDMA, 1 RB, 20 MHz, 16-QAM)	-1.44
10769	5G NR (CP-OFDM, 1 RB, 15 MHz, QPSK, 15 kHz)	-12.08
10061	IEEE 802.11b WiFi 2.4 GHz (DSSS, 11 Mbps)	-2.02
10077	IEEE 802.11g WiFi 2.4 GHz (DSSS/OFDM, 54 Mbps)	0.12
10427	IEEE 802.11n (HT Greeneld, 150 Mbps, 64-QAM)	-13.44
10069	IEEE 802.11a/h WiFi 5 GHz (OFDM, 54 Mbps)	-3.15
10616	IEEE 802.11ac WiFi (40MHz, MCS0, 90pc duty cycle)	-5.57
10671	IEEE 802.11ax (20MHz, MCS0, 90pc duty cycle)	-5.58

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## 11. Low-power Exemption

#### <Max Tune-up Limit>

**General Note:** All applicable modes supported by the device have their held-to-ear conducted power table s listed below and were used for the individual mode evaluations in the section. Maximum output power is verified for all applicable test channels for all air interfaces which require test scans.

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#### <Ant0>

CAIIIU>	Average Power		
Freque	(dBm)		
	GSM850	33.50	
GSM	EDGE850	27.00	
GSIVI	GSM1900	30.50	
	EDGE1900	26.00	
	Band V	25.00	
WCDMA	Band IV	25.00	
VVCDIVIA	Band II	25.00	
	HSPA	24.00	
	Band 2	24.00	
	Band 4	24.00	
	Band 5	24.00	
	Band 7	24.00	
FDD LTE	Band 12	24.00	
	Band 13	24.00	
	Band 17	24.00	
	Band 26	24.00	
	Band 66	24.00	
TDD LTE	Band 38	24.00	
IDD LIE	Band 41	24.00	
	n2	24.00	
5G NR FDD	n5	24.00	
SG NK FDD	n7	24.00	
	n66	24.00	
5G NR TDD	n38	24.00	
3G NK TDD	n41	24.00	

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<Ant1>

<anti></anti>						
Freque	Average Power (dBm)					
	GSM850	29.00				
GSM	EDGE850	23.00				
GSIVI	GSM1900	23.50				
	EDGE1900	18.50				
	Band V	25.0				
WCDMA	Band IV	19.00				
WCDIVIA	Band II	19.00				
	HSPA	24.0				
	Band 2	18.00				
	Band 4	18.00				
	Band 5	24.00				
	Band 7	18.00				
FDD LTE	Band 12	22.50				
	Band 13	22.50				
	Band 17	22.50				
	Band 26	24.00				
	Band 66	18.00				
TDD LTE	Band 38	17.00				
	Band 41	17.00				
	n2	20.00				
5G NR FDD	n5	24.00				
99 NK 1 DD	n7	18.00				
	n66	20.00				
5G NR TDD	n38	17.50				
30 NK 100	n41	17.50				

#### <Ant2>

Freque	Average Power (dBm)	
TDD LTE	Band 42	18.00
5G NR TDD	n77 PC3	18.50
	n77 PC2	18.50
	n78 PC3	18.50
	n78 PC2	18.50

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#### <Ant4>

Frequency Band		Average Power (dBm)
5G NR TDD	n77 PC3	17.00
	n77 PC2	17.00
	n78 PC3	17.00
	n78 PC2	17.00

#### <Ant5>

Frequency Band		Average Power (dBm)
5G NR TDD	n77 PC3	17.50
	n77 PC2	17.50
	n78 PC3	17.50
	n78 PC2	17.50

#### <Ant7>

Frequency Band		Average Power (dBm)
	n77_PC3	23.50
EC ND TDD	n77_PC2	26.50
5G NR TDD	n78_PC3	23.50
	n78_PC2	26.50

#### <WLAN>

Freque	Average Power (dBm)	
	802.11b	23.00
	802.11g	22.50
2.4GHz WLAN	802.11n-HT20	23.00
2.4GHZ WLAN	802.11n-HT40	21.00
	802.11ax-HE20	23.00
	802.11ax-HE40	21.00
	802.11a	19.30
	802.11n-HT20	19.30
	802.11n-HT40	19.30
	802.11ac-VHT20	19.30
5GHz WLAN	802.11ac-VHT40	19.30
	802.11ac-VHT80	19.30
	802.11ax-HE20	19.30
	802.11ax-HE40	19.30
	802.11ax-HE80	19.30

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#### <Low Power Exemption>

#### <Ant0>

Air Interface	Max Average Antenna Input Power (dBm)	Worst Case MIF (dB)	Power + MIF(dB)	C63.19 test required
GSM850	33.50	3.63	37.13	Yes
EDGE850	27.00	3.75	30.75	No <sup>(1)</sup>
GSM1900	30.50	3.63	34.13	Yes
EDGE1900	26.00	3.75	29.75	No <sup>(1)</sup>
WCDMA	25.00	-25.43	-0.43	No
WCDMA - HSPA	24.00	-20.39	3.61	No
LTE - FDD	24.00	-9.76	14.24	No
LTE – TDD	24.00	-1.44	22.56	Yes
5G FR1 - FDD	24.00	-12.08	11.92	No
5G NR - TDD	24.00	-12.08	11.92	No

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#### <Ant1>

Air Interface	Max Average Antenna Input Power (dBm)	Worst Case MIF (dB)	Power + MIF(dB)	C63.19 test required
GSM850	29.00	3.63	32.63	Yes
EDGE850	23.00	3.75	26.75	No <sup>(1)</sup>
GSM1900	23.50	3.63	27.13	Yes
EDGE1900	18.50	3.75	22.25	No <sup>(1)</sup>
WCDMA	25.00	-25.43	-0.43	No
WCDMA - HSPA	24.00	-20.39	3.61	No
LTE - FDD	24.00	-9.76	14.24	No
LTE – TDD	17.00	-1.44	15.56	No
5G FR1 - FDD	24.00	-12.08	11.92	No
5G NR - TDD	17.50	-12.08	5.42	No

#### <Ant2>

Air Interface	Max Average Antenna Input Power (dBm)	Worst Case MIF (dB)	Power + MIF(dB)	C63.19 test required
LTE – TDD	20.50	-1.44	19.06	Yes
5G NR - TDD	18.50	-12.08	6.42	No

#### <Ant4>

Air Interface	Max Average Antenna Input Power (dBm)	Worst Case MIF (dB)	Power + MIF(dB)	C63.19 test required
5G NR - TDD	17.00	-12.08	4.92	No

#### <Ant5>

Air Interface	Max Average Antenna Input Power (dBm)	Worst Case MIF (dB)	Power + MIF(dB)	C63.19 test required
5G NR - TDD	17.50	-12.08	5.42	No

#### <Ant7>

Air Interface	Max Average Antenna Input Power (dBm)	Worst Case MIF (dB)	Power + MIF(dB)	C63.19 test required
5G NR - TDD	26.50	-12.08	14.42	No

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#### <WLAN>

Air Interface	Max Average Antenna Input Power (dBm)	Worst Case MIF (dB)	Power + MIF(dB)	C63.19 test required
802.11b	23.00	-2.02	20.98	No <sup>(2)</sup>
802.11g	22.50	0.12	22.62	Yes
802.11n-HT20	23.00	-13.44	9.56	No
802.11n-HT40	21.00	-13.44	7.56	No
802.11ax-HE20	23.00	-5.58	17.42	No <sup>(2)</sup>
802.11ax-HE40	21.00	-5.58	15.42	No
802.11a	19.30	-3.15	16.15	No
802.11n-HT20	19.30	-13.44	5.86	No
802.11n-HT40	19.30	-13.44	5.86	No
802.11ac-VHT20	19.30	-5.57	13.73	No
802.11ac-VHT40	19.30	-5.57	13.73	No
802.11ac-VHT80	19.30	-5.57	13.73	No
802.11ax-HE20	19.30	-5.58	13.72	No
802.11ax-HE40	19.30	-5.58	13.72	No
802.11ax-HE80	19.30	-5.58	13.72	No

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#### **General Note:**

- 1. EDGE data modes is not necessary due the GSM Voice mode is the worst case.
- 2. 802.11b and 802.11ax-HE20 is not necessary due to the 802.11g is the worst case.
- 3. 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.
- 4. HAC RF rating is M4 for the air interface which meets the low power exemption.

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## 12. Conducted RF Output Power (Unit: dBm)

#### <GSM>

Average Antenna Input Power(dBm)								
Band	Band GSM850 Ant0 GSM1900 Ant0							
Channel	128	189	251	512	661	810		
Frequency (MHz) 824.2		836.4	848.8	1850.2	1880.0	1909.8		
GSM (GMSK, 1 Tx slot)	32.83	32.85	32.80	29.81	29.67	29.55		

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Average Antenna Input Power(dBm)								
Band	GSM850 Ant1 GSM1900 Ant1							
Channel	128	128 189 251			661	810		
Frequency (MHz)	824.2	836.4	848.8	1850.2	1880.0	1909.8		
GSM (GMSK, 1 Tx slot)	28.66	28.81	28.68	22.57	22.68	22.58		

#### <LTE>

Band 38 Ant0								
BW [MHz]	Modulation	RB Size	Power Low Ch. / Freq.	Power Middle Ch. / Freq.	Power High Ch. / Freq.			
	Cha	nnel	37850	38000	38150			
Frequency (MHz)				2580	2595	2610		
20	QPSK	1	0	22.70	22.75	22.73		

Band 41 Ant0									
BW [MHz]	Modulation	RB Size	RB Offset	Power Low Ch. / Freq.	Power Low Middle Ch. / Freq.	Power Middle Ch. / Freq.	Power High Middle Ch. / Freq.	Power High Ch. / Freq.	
	Channel			39750	40185	40620	41055	41490	
Frequency (MHz)		2506	2549.5	2593	2636.5	2680			
20	QPSK	1	0	22.77	22.72	22.84	22.65	22.58	

Part27Q Band 42 Ant2								
BW [MHz]	Modulation	Power Low Ch. / Freq.	Power Middle Ch. / Freq.	Power High Ch. / Freq.				
	Cha	nnel	42190	42590	42990			
	Frequency (MHz)				3500	3540		
20	QPSK	1	0	17.01	17.06	17.02		

#### <WLAN>

2.4011-10/1.401	Mode	Channel	Frequency (MHz)	Average power (dBm)
2.4GHz WLAN	802.11g 6Mbps	1	2412	20.53
		6	2437	21.30
		11	2462	21.19

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## 13. HAC RF Emission Test Results

Plot No.	Air Interface	Mode	Channel	Transmit Ant.	Average Antenna Input Power (dBm)	MIF	E-Field (dBV/m)	Margin to FCC M3 limit (dB)	E-Field M Rating
1	GSM850	Voice	128	Ant 0	32.83	3.63	35.35	9.65	M4
2	GSM850	Voice	189	Ant 0	32.85	3.63	34.67	10.33	M4
3	GSM850	Voice	251	Ant 0	32.80	3.63	34.02	10.98	M4
4	GSM850	Voice	128	Ant 1	28.66	3.63	40.67	4.33	М3
5	GSM850	Voice	189	Ant 1	28.81	3.63	40.10	4.90	М3
6	GSM850	Voice	251	Ant 1	28.68	3.63	39.12	5.88	M4
7	GSM1900	Voice	512	Ant 0	29.81	3.63	25.57	9.43	M4
8	GSM1900	Voice	661	Ant 0	29.67	3.63	27.25	7.75	M4
9	GSM1900	Voice	810	Ant 0	29.55	3.63	26.53	8.47	M4
10	GSM1900	Voice	512	Ant 1	22.57	3.63	32.26	2.74	М3
11	GSM1900	Voice	661	Ant 1	22.68	3.63	32.33	2.67	М3
12	GSM1900	Voice	810	Ant 1	22.58	3.63	32.50	2.50	М3
13	LTE Band 41	20M_QPSK_1_0	39750	Ant 0	22.77	-1.44	18.48	16.52	M4
14	LTE Band 41	20M_QPSK_1_0	40185	Ant 0	22.72	-1.44	17.94	17.06	M4
15	LTE Band 41	20M_QPSK_1_0	40620	Ant 0	22.84	-1.44	20.14	14.86	M4
16	LTE Band 41	20M_QPSK_1_0	41055	Ant 0	22.65	-1.44	19.17	15.83	M4
17	LTE Band 41	20M_QPSK_1_0	41490	Ant 0	22.58	-1.44	17.97	17.03	M4
18	LTE Band 42	20M_QPSK_1_0	42190	Ant 2	17.01	-1.44	26.03	8.97	M4
19	LTE Band 42	20M_QPSK_1_0	42590	Ant 2	17.06	-1.44	26.00	9.00	M4
20	LTE Band 42	20M_QPSK_1_0	42990	Ant 2	17.02	-1.44	26.13	8.87	M4
24	WLAN2.4GHz	802.11g 6Mbps	1	Ant 6+3	20.53	0.12	26.77	8.23	M4
25	WLAN2.4GHz	802.11g 6Mbps	6	Ant 6+3	21.30	0.12	27.04	7.96	M4
26	WLAN2.4GHz	802.11g 6Mbps	11	Ant 6+3	21.19	0.12	27.00	8.00	M4

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#### Remark:

 The HAC measurement system applies MIF value onto the measured RMS E-field, which is indirect method in ANSI C63.19 2011 version, and reports the RF audio interference level.

2. Phone Condition: Mute on; Backlight off; Max Volume

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#### 14. Uncertainty Assessment

The component of uncertainly may generally be categorized according to the methods used to evaluate them. The evaluation of uncertainly by the statistical analysis of a series of observations is termed a Type A evaluation of uncertainty. The evaluation of uncertainty by means other than the statistical analysis of a series of observation is termed a Type B evaluation of uncertainty. Each component of uncertainty, however evaluated, is represented by an estimated standard deviation, termed standard uncertainty, which is determined by the positive square root of the estimated variance.

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The combined standard uncertainty of the measurement result represents the estimated standard deviation of the result. It is obtained by combining the individual standard uncertainties of both Type A and Type B evaluation using the usual "root-sum-squares" (RSS) methods of combining standard deviations by taking the positive square root of the estimated variances. Expanded uncertainty is a measure of uncertainty that defines an interval about the measurement result within which the measured value is confidently believed to lie. It is obtained by multiplying the combined standard uncertainty by a coverage factor. For purpose of this document, a coverage factor two is used, which corresponds to confidence interval of about 95 %. The DASY uncertainty Budget is showed in Table 14.1.

The judgment of conformity in the report is based on the measurement results excluding the measurement uncertainty.

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Error Description	Uncertainty Value (±%)	Probability	Divisor	(Ci) E	Standard Uncertainty (E) (±%)
Measurement System					
Probe Calibration	5.1	N	1	1	5.1
Axial Isotropy	4.7	R	1.732	1	2.7
Sensor Displacement	16.5	R	1.732	1	9.5
Boundary Effects	2.4	R	1.732	1	1.4
Phantom Boundary Effect	7.2	R	1.732	1	4.2
Linearity	4.7	R	1.732	1	2.7
Scaling with PMR calibration	10.0	R	1.732	1	5.8
System Detection Limit	1.0	R	1.732	1	0.6
Readout Electronics	0.3	N	1	1	0.3
Response Time	2.6	R	1.732	1	1.5
Integration Time	2.6	R	1.732	1	1.5
RF Ambient Conditions	3.0	R	1.732	1	1.7
RF Reflections	12.0	R	1.732	1	6.9
Probe Positioner	1.2	R	1.732	1	0.7
Probe Positioning	4.7	R	1.732	1	2.7
Extrap. and Interpolation	1.0	R	1.732	1	0.6
Test Sample Related					
Device Positioning Vertical	4.7	R	1.732	1	2.7
Device Positioning Lateral	1.0	R	1.732	1	0.6
Device Holder and Phantom	2.4	R	1.732	1	1.4
Power Drift	5.0	R	1.732	1	2.9
Phantom and Setup Related					
Phantom Thickness	1.4				
Combi	16.4%				
Cover	age Factor for 95	%			K=2
Expan	32.7%				

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Table 14.1 Uncertainty Budget of HAC free field assessment

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#### 15. 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.

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- [2] FCC KDB 285076 D01v06r02, "Equipment Authorization Guidance for Hearing Aid Compatibility", September 19, 2022
- [3] FCC KDB 285076 D03v01r06, "Hearing aid compatibility frequently asked questions", July 20, 2022.
- [4] SPEAG DASY System Handbook

----THE END-----

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