

Report No.: HA051232-03A



HEARING AID COMPATIBILITY RF EMISSIONS TEST REPORT

FCC ID : IHDT56ZB1

Equipment: Mobile Cellular Phone

Brand Name : Motorola

Model Name : XT2071-2, XT2071-3, XT2071-5

M-Rating : M4

Applicant : Motorola Mobility, LLC

222 W Merchandise Mart Plaza, Suite 1800,

Chicago, IL 60654, United States

Standard : FCC 47 CFR §20.19

ANSI C63.19-2011

The product was received on May 22, 2020 and testing was started from Jun. 16, 2020 and completed on Jun. 22, 2020. We, SPORTON INTERNATIONAL INC., 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. EMC & Wireless Communications Laboratory, the test report shall not be reproduced except in full.

Approved by: Cona Huang / Deputy Manager

Qua Guang.

SPORTON INTERNATIONAL INC. EMC & Wireless Communications Laboratory

No. 52, Huaya 1st Rd., Guishan Dist., Taoyuan City, Taiwan (R.O.C.)

TEL: 886-3-327-3456 Page: 1 of 23
FAX: 886-3-328-4978 Issued Date: Oct. 23, 2020



Report No.: HA051232-03A

Table of Contents

1.	General Information	
2.	Testing Location	5
3.	Applied Standards	5
4.	RF Audio Interference Level	5
5.	Air Interface and Operating Mode	6
6.	Measurement System Specification	7
	6.1 E-Field Probe System	7
	6.2 Data Storage and Evaluation	8
7.	RF Emissions Test Procedure	9
8.	Test Equipment List	.12
9.	Measurement System Validation	13
10.	Modulation Interference Factor	.14
11.	Low-power Exemption	15
	Conducted RF Output Power (Unit: dBm)	
13.	HAC RF Emission Test Results	19
	Uncertainty Assessment	
	References	

Appendix A. Plots of System Performance Check Appendix B. Plots of RF Emission Measurement Appendix C. DASY Calibration Certificate Appendix D. Test Setup Photos

TEL: 886-3-327-3456 FAX: 886-3-328-4978 Form version: 200414 Page: 2 of 23 Issued Date: Oct. 23, 2020

History of this test report

Report No.: HA051232-03A

Report No.	Version	Description	Issued Date	
HA051232-03A	Rev. 01	Initial issue report	Oct. 23, 2020	

TEL: 886-3-327-3456 Page: 3 of 23
FAX: 886-3-328-4978 Issued Date: Oct. 23, 2020

1. General Information

Product Feature & Specification						
Applicant Name	Motorola Mobility, LLC					
Equipment Name	Mobile Cellular Phone					
Brand Name	Motorola					
Model Name	XT2071-2, XT2071-3, XT2071-5					
FCC ID	IHDT56ZB1					
EUT Stage	Identical Prototype					
Date Tested	2020/06/16 ~ 2020/06/22					
Frequency Band	GSM850: 824.2 MHz ~ 848.8 MHz GSM1900: 1850.2 MHz ~ 1909.8 MHz WCDMA Band II: 1850 MHz ~ 1910 MHz WCDMA Band II: 1850 MHz ~ 1755 MHz WCDMA Band IV: 1710 MHz ~ 1755 MHz WCDMA Band V: 824 MHz ~ 849 MHz CDMA2000 BC0: 824.7 MHz ~ 848.31 MHz CDMA 2000 BC1: 851.25 MHz ~ 1908.75 MHz CDMA 2000 BC1: 851.25 MHz ~ 1908.75 MHz CDMA 2000 BC10: 817.9 MHz ~ 823.1 MHz LTE Band 2: 1850 MHz ~ 1910 MHz LTE Band 4: 1710 MHz ~ 1755 MHz LTE Band 5: 824 MHz ~ 849 MHz LTE Band 6: 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 13: 777 MHz ~ 787 MHz LTE Band 17: 704 MHz ~ 716 MHz LTE Band 17: 704 MHz ~ 716 MHz LTE Band 25: 1850 MHz ~ 2915 MHz LTE Band 30: 2305 MHz ~ 2315 MHz LTE Band 30: 2305 MHz ~ 2315 MHz LTE Band 38: 2570 MHz ~ 2620 MHz LTE Band 48: 3550 MHz ~ 3700 MHz LTE Band 48: 3550 MHz ~ 3700 MHz LTE Band 66: 1710 MHz ~ 1780 MHz LTE Band 71: 663 MHz ~ 698 MHz GN R n2: 1850 MHz ~ 1910 MHz SG NR n2: 1850 MHz ~ 1910 MHz SG NR n2: 1850 MHz ~ 1910 MHz SG NR n41: 2496 MHz ~ 2690 MHz SG NR n5: 824 MHz ~ 849 MHz SG NR n66: 1710 MHz ~ 1780 MHz SG NR n61: 1710 MHz ~ 2493 MHz SG NR n61: 1710 MHz ~ 2493 MHz SG NR n61: 1710 MHz ~ 2500 MHz SG NR n61: 1710 MHz ~ 2483.5 MHz WLAN 5.6GHz Band: 5470 MHz ~ 5325 MHz WLAN 5.6GHz Band: 5470 MHz ~ 5725 MHz WLAN 5.6GHz Band: 5470 MHz ~ 5825 MHz Bluetoottc: 2400					
Mode	GSM/GPRS/EGPRS RMC/AMR 12.2Kbps HSDPA HSUPA DC-HSDPA LTE: QPSK, 16QAM, 64QAM 5G NR: DFT-s-OFDM/CP-OFDM, Pi/2 BPSK/QPSK/16QAM/64QAM WLAN: 802.11a/b/g/n/ac HT20/HT40/VHT20/VHT40/VHT80 Bluetooth BR/EDR/LE NFC:ASK					

Report No.: HA051232-03A

Reviewed by: <u>Jason Wang</u> Report Producer: <u>Daisy Peng</u>

TEL: 886-3-327-3456 Page: 4 of 23
FAX: 886-3-328-4978 Issued Date: Oct. 23, 2020

^{1.} In this report is enable 5G FR1 n41 and n71 SA mode, other frequency is refer to original Sporton RF emission report, report no.: HA051232-02A

2. Testing Location

Sporton Lab is accredited to ISO 17025 by Taiwan Accreditation Foundation (TAF code: 1190) and the FCC designation No. TW1190 under the FCC 2.948(e) by Mutual Recognition Agreement (MRA) in FCC test.

Report No.: HA051232-03A

Testing Laboratory						
Test Site SPORTON INTERNATIONAL INC.						
Test Site Location	No. 52, Huaya 1st Rd., Guishan Dist., Taoyuan City, Taiwan (R.O.C.) TEL: +886-3-327-3456 FAX: +886-3-328-4978					
Test Site No. Sporton Site No.: SAR04-HY						

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 v01r01

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 5.1 Telephone near-field categories in linear units

TEL: 886-3-327-3456 Page: 5 of 23
FAX: 886-3-328-4978 Issued Date: Oct. 23, 2020



5. Air Interface and Operating Mode

Air		_	C63.19	Simultaneous	Name of Voice	Power
Interface	Band MHz	Туре	Tested	Transmitter	Service	Reduction
	GSM850	VO	Yes	WLAN, BT	CMDC Voice	No
	GSM1900	VO		WLAN, BT	CMRS Voice	No
GSM	EDGE850	\/D	.,	WLAN, BT	Casala Dua	No
	EDGE1900	VD	Yes	WLAN, BT	Google Duo	No
	Band II			WLAN, BT		No
MCDMA	Band IV	VO	No ⁽¹⁾	WLAN, BT	CMRS Voice	No
WCDMA	Band V			WLAN, BT		No
	HSPA	VD	No ⁽¹⁾	WLAN, BT	Google Duo	No
	BC0			WLAN, BT		No
CDMA	BC1	VO	Yes	WLAN, BT	CMRS Voice	No
CDIVIA	BC10			WLAN, BT		No
	EVDO	VD	No ⁽¹⁾	WLAN, BT	Google Duo	No
	Band 2			5G NR, WLAN, BT		No
	Band 4			5G NR, WLAN, BT		No
	Band 5			5G NR, WLAN, BT		No
	Band 7			5G NR, WLAN, BT		No
	Band 12		No ⁽¹⁾	5G NR, WLAN, BT		No
	Band 13			5G NR, WLAN, BT	VoLTE / Google Duo	No
LTE (FDD)	Band 14	VD		5G NR, WLAN, BT		No
(100)	Band 17			5G NR, WLAN, BT		No
	Band 25			5G NR, WLAN, BT		No
	Band 26			5G NR, WLAN, BT		No
	Band 30		-	5G NR, WLAN, BT		No
	Band 66			5G NR, WLAN, BT		No
	Band 71			5G NR, WLAN, BT		No
	Band 38			5G NR, WLAN, BT	VoLTE	No
LTE (TDD)	Band 41	VD	Yes	5G NR, WLAN, BT	/	No
(100)	Band 48			5G NR, WLAN, BT	Google Duo	No
	n2			LTE, WLAN, BT		No
	n5			LTE, WLAN, BT		No
EC ND	n25	VD	No ⁽¹⁾	LTE, WLAN, BT	Coorlo Duo	No
5G NR	n41	VD	INO.	LTE, WLAN, BT	Google Duo	No
	n66			LTE, WLAN, BT		No
	n71			LTE, WLAN, BT		No
	2450					No
	5200			00M/W0DMA 0DMA LTE =0	VoWiFi	No
Wi-Fi	5300	VD	No ⁽¹⁾	GSM,WCDMA,CDMA,LTE, 5G NR, BT	/	No
	5500			IVIV, DI	Google Duo	No
	5800				No	
ВТ	2450	DT	No	GSM,WCDMA,CDMA,LTE, 5G NR, WiFi	NA	No
BT Type Transr		DT	No		NA	No

Report No.: HA051232-03A

Type Transport: VO= Voice only

TEL: 886-3-327-3456 Page: 6 of 23 Issued Date: Oct. 23, 2020 FAX: 886-3-328-4978

DT= Digital Transport only (no voice)

VD= CMRS and IP Voice Service over Digital Transport

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.

6. Measurement System Specification

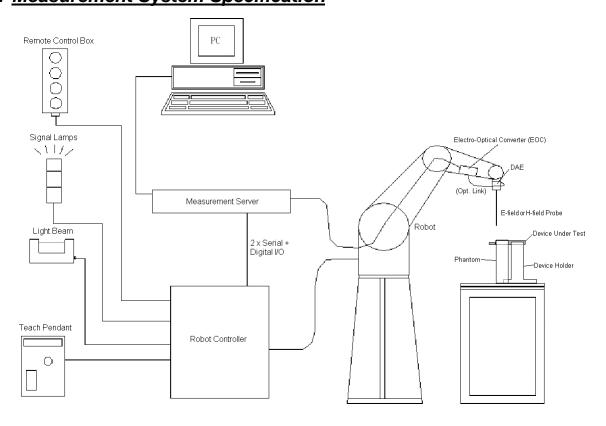


Fig 5.1 System Configurations

6.1 E-Field Probe System

E-Field Probe Specification <ER3DV6>

Probo Tip Doscript	Distance from probe tip to dipole centers: 2.5 mm	1 1g 3.2
	Tip diameter: 8 mm (Body: 12 mm)	Fig 5.2
Dimensions	Overall length: 330 mm (Tip: 16 mm)	
Linearity	± 0.2 dB	11 112
	compression point)	A BB
	(M3 or better device readings fall well below diode	
Dynamic Range	2 V/m to 1000 V/m	11.1
	± 0.4 dB in air (rotation normal to probe axis)	90
Directivity	± 0.2 dB in air (rotation around probe axis)	-48
	Linearity: ± 2.0 dB (100 MHz to 3 GHz)	4
Frequency	100 MHz to 6 GHz;	11
	(absolute accuracy ±6.0%, k=2)	
Calibration	In air from 100 MHz to 3.0 GHz	
	Built-in shielding against static charges	
Construction		



Report No.: HA051232-03A

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).

TEL: 886-3-327-3456 Page: 7 of 23 FAX: 886-3-328-4978 Issued Date: Oct. 23, 2020

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.

Report No.: HA051232-03A

Probe parameters: - Sensitivity Norm_i, a_{i0} , a_{i1} , a_{i2}

Conversion factor ConvF_i
 Diode compression point dcp_i

- Diode compression point dep

Device parameters: - Frequency f

- Crest factor cf

 $\textbf{Media parameters}: \qquad \text{- Conductivity} \qquad \qquad \sigma$

- 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_i = diode compression point (DASY parameter)

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

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

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

Norm_i = 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_i = 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.

TEL: 886-3-327-3456 Page: 8 of 23 FAX: 886-3-328-4978 Issued Date: Oct. 23, 2020



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.

Report No.: HA051232-03A

- 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.

TEL: 886-3-327-3456 Page: 9 of 23
FAX: 886-3-328-4978 Issued Date: Oct. 23, 2020

IC RF EMISSIONS TEST REPORT Report No.: HA051232-03A

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

TEL: 886-3-327-3456 Page: 10 of 23 FAX: 886-3-328-4978 Issued Date: Oct. 23, 2020



Fig 8.2 EUT reference and plane for HAC RF emission measurements

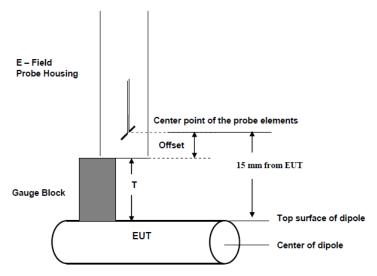


Fig. 8.3 Gauge block with E-field probe

TEL: 886-3-327-3456 Page: 11 of 23 FAX: 886-3-328-4978 Issued Date: Oct. 23, 2020



8. Test Equipment List

Manufactures	Name of Equipment	Tomo/Mandal	Carial Namehan	Calib	ration
Manufacturer	Name of Equipment	Type/Model	Serial Number	Last Cal.	Due Date
SPEAG	835MHz Calibration Dipole ⁽²⁾	CD835V3	1045	Sep. 19, 2018	Sep. 17, 2020
SPEAG	1880MHz Calibration Dipole (2)	CD1880V3	1038	Sep. 19, 2018	Sep. 17, 2020
SPEAG	2450MHz Calibration Dipole ⁽²⁾	CD2450V3	1186	Jan. 30, 2019	Jan. 28, 2021
SPEAG	2600Mhz Calibration Dipole ⁽²⁾	CD2600V3	1010	Mar. 14, 2019	Mar. 12, 2021
SPEAG	3500Mhz Calibration Dipole ⁽²⁾	CD3500V3	1009	Feb. 18, 2019	Feb. 16, 2021
SPEAG	5500Mhz Calibration Dipole	CD5500V3	1009	Jan. 30, 2019	Jan. 28, 2021
SPEAG	Isotropic E-Field Probe	EF3DV3	4047	Jan. 24, 2020	Jan. 23, 2021
SPEAG	Data Acquisition Electronics	DAE3	577	Sep. 17, 2019	Sep. 16, 2020
RCPTWN	Thermometer	HTC-1	TM685-1	Nov. 12, 2019	Nov. 11, 2020
R&S	Base Station	CMW500	149637	Sep. 03, 2019	Sep. 02, 2020
R&S	Base Station	CMU200	117591	Dec. 09, 2019	Dec. 08, 2020
SPEAG	Test Arch Phantom	N/A	N/A	NCR	NCR
SPEAG	Phone Positioner	N/A	N/A	NCR	NCR
Anritsu	Signal Generator	MG3710A	6201502524	Nov. 20, 2019	Nov. 19, 2020
Anritsu	Power Meter	ML2495A	1036004	Aug. 08, 2019	Aug. 07, 2020
Anritsu	Power Sensor	MA2411B	1027253	Aug. 08, 2019	Aug. 07, 2020
ATM	Dual Directional Coupler	C122H-10	P610410z-02	NCR	NCR
Woken	Attenuator	WK0602-XX	N/A	NCR	NCR
Agilent	Spectrum Analyzer	E4408B	MY44211028	Aug. 27, 2019	Aug. 26, 2020
Mini-Circuits	Power Amplifier	ZVE-8G+	6418	Oct. 16, 2019	Oct. 15, 2020
Mini-Circuits	Power Amplifier	ZHL-42W+	715701915	May. 07, 2020	May. 06, 2021

Report No.: HA051232-03A

Note:

- 1. NCR: "No-Calibration Required"
- The dipole calibration interval can be extended to 3 years with justification according to KDB 865664 D01. The dipoles are also not physically damaged, or repaired during the interval. The justification data in appendix C can be found which the return loss is < -20dB, within 20% of prior calibration, the impedance is within 5 ohm of prior calibration for each dipole.

TEL: 886-3-327-3456 Page: 12 of 23
FAX: 886-3-328-4978 Issued Date: Oct. 23, 2020

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.

Report No.: HA051232-03A

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.

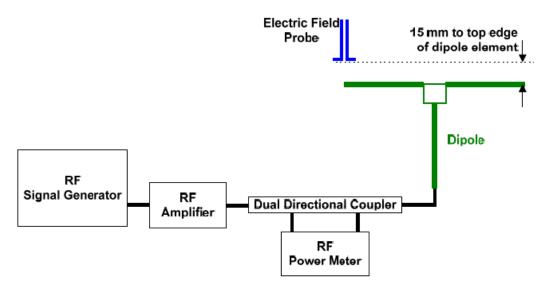


Fig. 7.1 Setup Diagram

<Validation Results>

Comparing to the original E-field value provided by SPEAG, the verification data should be within its specification of 25 %. 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 above high end (V/m)	E-Field above low end (V/m)	Average Value (V/m)	Deviation (%)	Date
835	20	108.8	115.8	117.6	116.7	7.26	Jun 16, 2020
1880	20	89.5	90.74	91.74	91.24	1.94	Jun 16, 2020
2450	20	84.1	85.29	85.3	85.295	1.42	Jun 22, 2020
2600	20	84.5	85.77	87.42	86.595	2.48	Jun 16, 2020
3500	20	84.6	87.88	91.71	89.795	6.14	Jun 16, 2020
5500	20	99.8	95.75	97.95	96.85	-2.96	Jun 22, 2020

TEL: 886-3-327-3456 Page: 13 of 23
FAX: 886-3-328-4978 Issued Date: Oct. 23, 2020

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

Report No.: HA051232-03A

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
10081	CDMA2000 (1xRTT, RC3)	-19.71
10295	CDMA2000 (1xRTT, RC1 SO3, 1/8th Rate 25 fr.)	3.26
10403	CDMA2000 (1xEV-DO, Rev. 0)	-17.67
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

TEL: 886-3-327-3456 Page: 14 of 23 FAX: 886-3-328-4978 Issued Date: Oct. 23, 2020

Report No.: HA051232-03A

11. Low-power Exemption

<Max Tune-up Limit>

			Average Power (dBm)		
Frequency Band			Ant 1	Ant 2	
	GSN	1 850	33.50		
CCM	EDG	E850	27.00		
GSM	GSM	1900	30.50		
	EDGE	E1900	26.00		
	Bar	nd V	24.00		
WODA44	Ban	d IV	24.00		
WCDMA	Bar	nd II	24.00		
	HS	PA	23.00		
	В	C0	25.00		
00144	В	C1	25.00		
CDMA	ВС	10	25.00		
	1xE	vDO	25.00		
		nd 2	24.00	22.00	
	Bar	nd 4	24.00	22.00	
	Bar	nd 5	24.00	23.00	
	Bar	nd 7	24.00	22.00	
	Ban	d 12	24.00	23.00	
	Ban	d 13	24.00	23.00	
FDD LTE	Ban	d 14	24.00	23.00	
	Ban	d 17	24.00	23.00	
	Band 25		24.00	22.00	
	Ban	d 26	24.00	23.00	
	Band 30		24.00	22.00	
	Ban	d 66	24.00	22.00	
	Band 71		24.00	23.00	
		QPSK	24.00	22.00	
	Band 38	16QAM	23.00	21.00	
		64QAM	22.00	20.00	
		QPSK	24.00	23.50	
TDD LTE	Band 41	16QAM	23.00	22.50	
		64QAM	22.00	21.50	
		QPSK	24.00	24.00	
	Band 48	16QAM	23.00	23.00	
		64QAM	22.00	22.00	
	n2/	n25	23.00	24.00	
	n	5	24.00	24.00	
5G NR	n ₄	41		27.00	
	n€	66	23.00	24.00	
	n7	71	23.00	24.00	

TEL: 886-3-327-3456 Page: 15 of 23
FAX: 886-3-328-4978 Issued Date: Oct. 23, 2020

Freq	Average Power (dBm)				
·	,,				
	802.11b	24			
2.4GHz WLAN	802.11g	23			
2.4GHZ WLAIN	802.11n-HT20	23			
	802.11n-HT40	18.5			
	802.11a	24			
	802.11n-HT20	23.5			
5GHz WLAN	802.11n-HT40	23.5			
SGHZ WLAN	802.11ac-VHT20	23.5			
	802.11ac-VHT40	23			
	802.11ac-VHT80	22.5			

<Low Power Exemption>

General Note:

1. EDGE data modes and 11b/11ac-VHT20/11ac-VHT40 is not necessary due the GSM Voice mode and 11g is the worst case.

Report No.: HA051232-03A

- 2. 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.
- 3. HAC RF rating is M4 for the air interface which meets the low power exemption.

	WWAN Ant 1								
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	Yes ⁽¹⁾					
GSM1900	30.50	3.63	34.13	Yes					
EDGE1900	26.00	3.75	29.75	Yes ⁽¹⁾					
WCDMA	24.00	-25.43	-1.43	No					
WCDMA - HSPA	24.00	-20.39	3.61	No					
CDMA Full Frame Rate	25.00	-19.71	5.29	No					
CDMA 1/8th Frame Rate	25.00	3.26	28.26	Yes					
CDMA - EVDO	25.00	-17.67	7.33	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					

WWAN Ant 2							
Air Interface Max Average Antenna Input Power (dBm) Morst Case MIF (dB) MIF(dB) Power + C63.19 test MIF(dB) required							
LTE - FDD	23.00	-9.76	13.24	No			
LTE – TDD	24.00	-1.44	22.56	Yes			
5G FR1 - FDD	27.00	-12.08	14.92	No			

TEL: 886-3-327-3456 Page: 16 of 23
FAX: 886-3-328-4978 Issued Date: Oct. 23, 2020

	WLAN Ant 1+2							
Air Interface	Max Average Antenna Input Power (dBm)	Worst Case MIF (dB)	Power + MIF(dB)	C63.19 test required				
802.11b	24.00	-2.02	21.98	Yes ⁽¹⁾				
802.11g	23.00	0.12	23.12	Yes				
802.11n-HT20	23.00	-13.44	9.56	No				
802.11n-HT40	18.50	-13.44	5.06	No				
802.11a	24.00	-3.15	20.85	Yes				
802.11n-HT20	23.50	-13.44	10.06	No				
802.11n-HT40	23.50	-13.44	10.06	No				
802.11ac-VHT20	23.50	-5.57	17.93	Yes ⁽¹⁾				
802.11ac-VHT40	23.00	-5.57	17.43	Yes ⁽¹⁾				
802.11ac-VHT80	22.50	-5.57	16.93	No				

Report No.: HA051232-03A

12. Conducted RF Output Power (Unit: dBm)

Average Antenna Input Power(dBm)						
Band GSM850 GSM1900						
Channel	128 189 251 512 661 810					810
Frequency (MHz)	Frequency (MHz) 824.2 836.4 848.8 1850.2 1880.0 1909.8					1909.8
GSM (GMSK, 1 Tx slot) 32.03 32.25 32.42 28.90 28.77 28.52						28.52

Average Antenna Input Power(dBm)									
Band CDMA2000 BC0 CDMA2000 BC1 CDMA2000 BC10							C10		
TX Channel	1013 384 777				600	1175	476	580	684
Frequency (MHz)	824.7	836.52	848.31	1851.25	1880	1908.75	817.9	820.5	823.1
1xRTT RC1 SO3, 1/8th Rate	24.03	24.15	24.12	23.95	23.97	24.11	23.82	23.88	23.89

<TDD LTE Band 41_Ant 1>

11.2.2	· · · · · · · · · · · · · · · · · · ·								
				Power	Power	Power	Power	Power	
BW [MHz]	Modulation	RB Size	RB Offset	Low	Low Middle	Middle	High Middle	High	
				Ch. / Freq.					
	Channel			39750	40185	40620	41055	41490	
Frequency (MHz)		2506	2549.5	2593	2636.5	2680			
20	QPSK	1	0	22.28	22.30	22.43	22.41	22.71	

<TDD LTE Band 41_Ant 2>

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				40185	40620	41055	41490
	Frequency (MHz)			2506	2549.5	2593	2636.5	2680
20	QPSK	1	0	22.09	22.03	22.15	22.02	22.06

<TDD LTE Band 48 Ant 2>

-	1100 212 2414 10_1112								
	BW [MHz]	Modulation	RB Size	RB Offset	Power Low Ch. / Freq.	Power Low Middle Ch. / Freq.	Power High Middle Ch. / Freq.	Power High Ch. / Freq.	
	Channel				55340	55830	56150	56640	
ĺ	Frequency (MHz)				3560	3609	3641	3690	
	20	QPSK	1	0	23.93	23.97	23.91	23.89	

TEL: 886-3-327-3456 Page: 17 of 23 FAX: 886-3-328-4978 Issued Date: Oct. 23, 2020

Report No. : HA051232-03A

<WLAN 2.4GHz>

2.4GHz WLAN	Mode	Channel	Frequency (MHz)	Average power (dBm)
2.4GHZ WLAN		1	2412	18.20
	802.11g 6Mbps	6	2437	22.95
		11	2462	17.14

<WLAN 5GHz>

E 2011- WILANI	Mode	Channel	Frequency (MHz)	Average power (dBm)
5.2GHz WLAN ANT 1+2		CH 36	5180	19.86
7	802.11a	CH 40	5200	19.41
	002.11a	CH 44	5220	19.61
		CH 48	5240	19.41

	Mode	Channel	Frequency (MHz)	Average power (dBm)
5.3GHz WLAN ANT 1+2		CH 52	5260	19.81
7	802.11a	CH 56	5280	19.77
	602.11a	CH 60	5300	19.67
		CH 64	5320	19.41

	Mode	Channel	Frequency (MHz)	Average power (dBm)
5 5011 14/1 441		CH 100	5500	19.61
5.5GHz WLAN ANT 1+2		CH 116	5580	19.53
/ / <u>_</u>	802.11a	CH 124	5620	19.60
	002.11a	CH 132	5660	19.84
		CH 140	5700	19.90
		CH 144	5720	19.84

5.8GHz WLAN	Mode	Channel	Frequency (MHz)	Average power (dBm)	
ANT 1+2	802.11a	CH 149	5745	23.35	
		CH 157	5785	23.38	
		CH 165	5825	23.34	

TEL: 886-3-327-3456 Page: 18 of 23
FAX: 886-3-328-4978 Issued Date: Oct. 23, 2020



13. HAC RF Emission Test Results

Plot No.	Air Interface	Mode	Channel	Transmit Ant.	Antenna Input Power (dBm)	MIF	E-Field (dBV/m)	Margin to FCC M3 limit (dB)	E-Field M Rating
1	GSM850	GSM Voice	128	Ant 1	32.03	3.63	34.13	10.87	M4
2	GSM850	GSM Voice	189	Ant 1	32.25	3.63	33.94	11.06	M4
3	GSM850	GSM Voice	251	Ant 1	32.42	3.63	33.03	11.97	M4
4	GSM1900	GSM Voice	512	Ant 1	28.90	3.63	27.65	7.35	M4
5	GSM1900	GSM Voice	661	Ant 1	28.77	3.63	27.79	7.21	M4
6	GSM1900	GSM Voice	810	Ant 1	28.52	3.63	27.64	7.36	M4
7	CDMA BC0	1xRTT, RC1 SO3, 18th Rate	1013	Ant 1	24.03	3.26	24.77	20.23	M4
8	CDMA BC0	1xRTT, RC1 SO3, 18th Rate	384	Ant 1	24.15	3.26	24.74	20.26	M4
9	CDMA BC0	1xRTT, RC1 SO3, 18th Rate	777	Ant 1	24.12	3.26	24.49	20.51	M4
10	CDMA BC1	1xRTT, RC1 SO3, 18th Rate	25	Ant 1	23.95	3.26	22.30	12.70	M4
11	CDMA BC1	1xRTT, RC1 SO3, 18th Rate	600	Ant 1	23.97	3.26	22.02	12.98	M4
12	CDMA BC1	1xRTT, RC1 SO3, 18th Rate	1175	Ant 1	24.11	3.26	22.73	12.27	M4
13	CDMA BC10	1xRTT, RC1 SO3, 18th Rate	476	Ant 1	23.82	3.26	25.32	19.68	M4
14	CDMA BC10	1xRTT, RC1 SO3, 18th Rate	580	Ant 1	23.88	3.26	29.36	15.64	M4
15	CDMA BC10	1xRTT, RC1 SO3, 18th Rate	684	Ant 1	23.89	3.26	29.00	16.00	M4
16	LTE Band 41	20M_QPSK_1_0	39750	Ant 1	22.28	-1.62	18.76	16.24	M4
17	LTE Band 41	20M_QPSK_1_0	40185	Ant 1	22.30	-1.62	19.89	15.11	M4
18	LTE Band 41	20M_QPSK_1_0	40620	Ant 1	22.43	-1.62	21.18	13.82	M4
19	LTE Band 41	20M_QPSK_1_0	41055	Ant 1	22.41	-1.62	20.17	14.83	M4
20	LTE Band 41	20M_QPSK_1_0	41490	Ant 1	22.71	-1.62	20.23	14.77	M4
21	LTE Band 41	20M_QPSK_1_0	39750	Ant 2	22.09	-1.62	20.32	14.68	M4
22	LTE Band 41	20M_QPSK_1_0	40185	Ant 2	22.03	-1.62	20.45	14.55	M4
23	LTE Band 41	20M_QPSK_1_0	40620	Ant 2	22.15	-1.62	21.72	13.28	M4
24	LTE Band 41	20M_QPSK_1_0	41055	Ant 2	22.02	-1.62	21.12	13.88	M4
25	LTE Band 41	20M_QPSK_1_0	41490	Ant 2	22.06	-1.62	20.31	14.69	M4
26	LTE Band 48	20M_QPSK_1_0	55340	Ant 2	23.93	-1.62	16.17	18.83	M4
27	LTE Band 48	20M_QPSK_1_0	55830	Ant 2	23.97	-1.62	15.61	19.39	M4
28	LTE Band 48	20M_QPSK_1_0	56150	Ant 2	23.91	-1.62	17.51	17.49	M4
29	LTE Band 48	20M_QPSK_1_0	56640	Ant 2	23.89	-1.62	14.97	20.03	M4

Report No.: HA051232-03A

TEL: 886-3-327-3456 Page: 19 of 23
FAX: 886-3-328-4978 Issued Date: Oct. 23, 2020



Plot No.	Air Interface	Mode	Channel	Transmit Ant.	Antenna Input Power (dBm)	MIF	E-Field (dBV/m)	Margin to FCC M3 limit (dB)	E-Field M Rating
30	WLAN2.4GHz	802.11g 6Mbps	1	Ant 1+2	18.20	0.12	20.77	14.23	M4
31	WLAN2.4GHz	802.11g 6Mbps	6	Ant 1+2	22.95	0.12	25.74	9.26	M4
32	WLAN2.4GHz	802.11g 6Mbps	11	Ant 1+2	17.14	0.12	25.54	9.46	M4
33	WLAN5GHz	802.11a 6Mbps	36	Ant 1+2	19.86	-3.15	20.16	14.84	M4
34	WLAN5GHz	802.11a 6Mbps	40	Ant 1+2	19.41	-3.15	20.88	14.12	M4
35	WLAN5GHz	802.11a 6Mbps	44	Ant 1+2	19.61	-3.15	20.36	14.64	M4
36	WLAN5GHz	802.11a 6Mbps	48	Ant 1+2	19.41	-3.15	20.18	14.82	M4
37	WLAN5GHz	802.11a 6Mbps	52	Ant 1+2	19.81	-3.15	20.56	14.44	M4
38	WLAN5GHz	802.11a 6Mbps	56	Ant 1+2	19.77	-3.15	20.15	14.85	M4
39	WLAN5GHz	802.11a 6Mbps	60	Ant 1+2	19.67	-3.15	19.92	15.08	M4
40	WLAN5GHz	802.11a 6Mbps	64	Ant 1+2	19.41	-3.15	20.34	14.66	M4
41	WLAN5GHz	802.11a 6Mbps	100	Ant 1+2	19.61	-3.15	20.73	14.27	M4
42	WLAN5GHz	802.11a 6Mbps	116	Ant 1+2	19.53	-3.15	21.13	13.87	M4
43	WLAN5GHz	802.11a 6Mbps	124	Ant 1+2	19.60	-3.15	20.73	14.27	M4
44	WLAN5GHz	802.11a 6Mbps	132	Ant 1+2	19.84	-3.15	19.04	15.96	M4
45	WLAN5GHz	802.11a 6Mbps	140	Ant 1+2	19.90	-3.15	18.67	16.33	M4
46	WLAN5GHz	802.11a 6Mbps	144	Ant 1+2	19.84	-3.15	18.97	16.03	M4
47	WLAN5GHz	802.11a 6Mbps	149	Ant 1+2	23.35	-3.15	19.56	15.44	M4
48	WLAN5GHz	802.11a 6Mbps	157	Ant 1+2	23.38	-3.15	20.05	14.95	M4
49	WLAN5GHz	802.11a 6Mbps	165	Ant 1+2	23.34	-3.15	19.89	15.11	M4

Report No.: HA051232-03A

Remark

- 1. 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

Test Engineer: Randy Lin and Carter Jhuang

TEL: 886-3-327-3456 Page: 20 of 23
FAX: 886-3-328-4978 Issued Date: Oct. 23, 2020

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.

Report No.: HA051232-03A

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 12.1.

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

TEL: 886-3-327-3456 Page: 21 of 23 Issued Date: Oct. 23, 2020 FAX: 886-3-328-4978



Error Description	Uncertainty Value (±%)	Probability Distribution	Divisor	Ci (E)	Standard Uncertainty (E)
Measurement System					
Probe Calibration	5.1	Normal	1	1	± 5.1 %
Axial Isotropy	4.7	Rectangular	√3	1	± 2.7 %
Sensor Displacement	16.5	Rectangular	√3	1	± 9.5 %
Boundary Effects	2.4	Rectangular	√3	1	± 1.4 %
Phantom Boundary Effects	7.2	Rectangular	√3	1	± 4.1 %
Linearity	4.7	Rectangular	√3	1	± 2.7 %
Scaling with PMR Calibration	10.0	Rectangular	√3	1	± 5.77 %
System Detection Limit	1.0	Rectangular	√3	1	± 0.6 %
Readout Electronics	0.3	Normal	1	1	± 0.3 %
Response Time	0.8	Rectangular	√3	1	± 0.5 %
Integration Time	2.6	Rectangular	√3	1	± 1.5 %
RF Ambient Conditions	3.0	Rectangular	√3	1	± 1.7 %
RF Reflections	12.0	Rectangular	√3	1	± 6.9 %
Probe Positioner	1.2	Rectangular	√3	1	± 0.7 %
Probe Positioning	4.7	Rectangular	√3	1	± 2.7 %
Extrap. and Interpolation	1.0	Rectangular	√3	1	± 0.6 %
Test Sample Related					
Device Positioning Vertical	4.7	Rectangular	√3	1	± 2.7 %
Device Positioning Lateral	1.0	Rectangular	√3	1	± 0.6 %
Device Holder and Phantom	2.4	Rectangular	√3	1	± 1.4 %
Power Drift	5.0	Rectangular	√3	1	± 2.9 %
Phantom and Setup Related					
Phantom Thickness	2.4	Rectangular	√3	1	± 1.4 %
Combined Standard Uncertain	± 16.30 %				
Coverage Factor for 95 %	K = 2				
Expanded Std. Uncertainty or	± 32.6 %				
Expanded Std. Uncertainty or	Field				± 16.3 %

Table 12.1 Uncertainty Budget of HAC free field assessment

Remark:

Worst-Case uncertainty budget for HAC free field assessment according to ANSIC63.19 [1], [2]. The budget is valid for the frequency range 700 MHz - 3 GHz and represents a worst case analysis.

TEL: 886-3-327-3456 Page: 22 of 23 FAX: 886-3-328-4978 Issued Date: Oct. 23, 2020



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.

Report No.: HA051232-03A

- [2] FCC KDB 285076 D02v03, "Guidance for performing T-Coil tests for air interfaces supporting voice over IP (e.g., LTE and WiFi) to support CMRS based telephone services", Sep 2017
- [3] FCC KDB 285076 D03v01r01, "Hearing aid compatibility frequently asked questions", Apr. 2020.
- [4] SPEAG DASY System Handbook

TEL: 886-3-327-3456 Page: 23 of 23
FAX: 886-3-328-4978 Issued Date: Oct. 23, 2020