

Federal Communication Commission  
Equipment Authorization Division,  
Application Processing Branch  
7435 Oakland Mills Road  
Columbia, MD 21048

**Phonak Communications  
AG**

Länggasse 17  
3280 Murten  
Switzerland

Phone +41 26 672 96 72  
Fax +41 26 672 35 11

June 12, 2013

**TO WHOM IT MAY CONCERN**

Dear Sir/Madam,

Herewith we confirm that the transmitter emissions from the product:

FCC ID Number  
***KWCMYLINKD***

Trade Name/Model  
***Roger MyLink***

is in compliance with the exposure limits for maximum permissible exposure specified in §1.1310, §1.1307(b)(1) and (2), §2.1093(c) of 47 C.F.R. and are categorically excluded from routine RF evaluation. Furthermore, according to section 4.3.1 of the FCC guidance for RF exposure evaluation of mobile and portable devices (KDB publication 447498 D01 General RF exposure guidance) standalone 1-g head or body and 10-g extremity SAR evaluation for general population exposure conditions, by measurement or simulation, is not required when the corresponding SAR Exclusion Threshold condition is satisfied. The above mentioned product, which is subject to this Equipment Authorization Filing, is a portable device as defined in §2.1093(b) of 47 CFR, operates in the frequency range 2.402-2.481 GHz with maximum conducted output power 0.016 mW (conducted power measurement results are enclosed as excerpt from Report No: 13-MO-0152.10 issued by Montena EMC on May 29, 2013). Following the formula in section 4.3.1 (1) for the range 100 MHz to 6 GHz and using the most conservative separation distance of 5 mm we obtain a result of 0.005 which is 600 times lower than the 1-g SAR test exclusion threshold. Therefore, the above mentioned product qualifies for SAR test exclusion and in lieu of SAR report we are submitting this statement of justification and compliance.

Should you have further questions, please do not hesitate to contact us.

Sincerely,



Neviana Nikoloski  
Phonak Communications AG  
Laenggasse 17, CH-3280 Murten, Switzerland  
Tel: +41 26 672 92 42  
email: [neviana.nikoloski@phonak.com](mailto:neviana.nikoloski@phonak.com)

## 8.2 Effective radiated power (conducted)

**Introduction:** The effective radiated power is the power radiated by the antenna of an interrogator in its direction of maximum gain under specified conditions of measurement.  
For EUT's with integral antenna the variations of the conducted power under extreme conditions are measured and expressed relatively to the measurements of the radiated measurement.

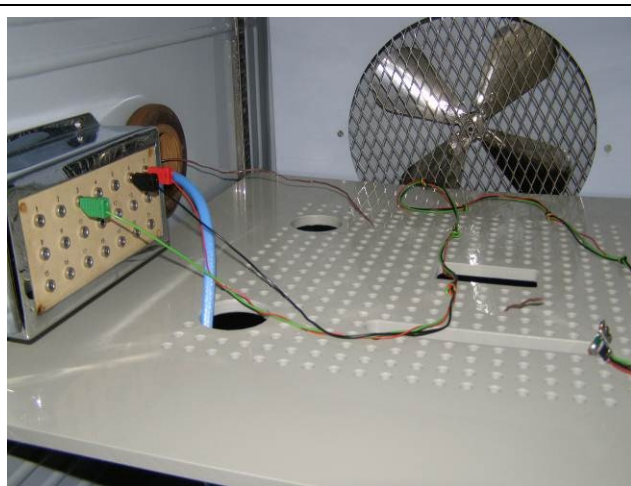
**Test site:** ☐ anechoic chamber (foam) ☐ open test site  
☐ anechoic chamber (ferrites) ☒ laboratory

**Meas. uncertainty:** 9 kHz – 3 GHz:  $\pm 1$  dB  
3 GHz – 6.7 GHz:  $\pm 2.1$  dB  
6.7 GHz – 13.2 GHz:  $\pm 2.6$  dB  
13.2 GHz – 19 GHz:  $\pm 2.8$  dB  
19 GHz – 26.5 GHz:  $\pm 3$  dB

**Test method:** Measurement of the conducted power on the antenna connector or a test fixture.

**Limit:** 10 mW e.i.r.p. (Generic use, 2 400 MHz to 2 483,5 MHz band)

**Test set-up:**



**Remarks:** - - -

**Test equipment:**

Spectrum analyser	<input type="checkbox"/> 88-14	<input checked="" type="checkbox"/> 02-06	<input type="checkbox"/> 03-45	<input type="checkbox"/> 05-39	<input type="checkbox"/> 07-53	<input type="checkbox"/> 10-70	
HF-wattmeter	<input checked="" type="checkbox"/> 95-97	<input type="checkbox"/> 01-15	<input type="checkbox"/> 01-17	<input type="checkbox"/> 03-12	<input type="checkbox"/> 04-96	<input type="checkbox"/> 05-20	<input type="checkbox"/> 05-73
Thermocouple detector	<input checked="" type="checkbox"/> 92-03 <input type="checkbox"/> 10-28	<input type="checkbox"/> 05-74	<input type="checkbox"/> 05-88	<input type="checkbox"/> 07-03	<input type="checkbox"/> 09-03	<input type="checkbox"/> 09-04	<input type="checkbox"/> 10-27
Diode detector	<input type="checkbox"/> 99-26	<input type="checkbox"/> 99-27					
Oscilloscope	<input type="checkbox"/> 90-14 <input type="checkbox"/> 05-28	<input type="checkbox"/> 93-85 <input type="checkbox"/> 05-44	<input type="checkbox"/> 93-86 <input type="checkbox"/> 06-46	<input type="checkbox"/> 01-20 <input type="checkbox"/> 06-64	<input type="checkbox"/> 04-06	<input type="checkbox"/> 04-50	<input type="checkbox"/> 05-22
Multimeter	<input checked="" type="checkbox"/> 08-17 <input type="checkbox"/> 04-47	<input type="checkbox"/> 90-38 <input type="checkbox"/> 04-104	<input type="checkbox"/> 92-25 <input type="checkbox"/> 04-105	<input type="checkbox"/> 94-51 <input type="checkbox"/> 06-51	<input type="checkbox"/> 95-93 <input type="checkbox"/> 06-52	<input type="checkbox"/> 02-03 <input checked="" type="checkbox"/> 05-46	<input type="checkbox"/> 03-22
Power supply	<input type="checkbox"/> 99-04	<input checked="" type="checkbox"/> 99-07	<input checked="" type="checkbox"/> 06-62				
Temperature chamber	<input checked="" type="checkbox"/> 06-66						
Temperature probe	<input type="checkbox"/> 91-11	<input type="checkbox"/> 03-05	<input type="checkbox"/> 05-34	<input checked="" type="checkbox"/> 08-03			
Frequency generator	<input type="checkbox"/> 88-23	<input type="checkbox"/> 00-42	<input type="checkbox"/> 03-39	<input type="checkbox"/> 04-03	<input type="checkbox"/> 04-89	<input type="checkbox"/> 05-78	<input type="checkbox"/> 07-02
Attenuator	<input type="checkbox"/> Weinschel						
Variable transformer	<input type="checkbox"/> 75-04						
Cables	<input type="checkbox"/> 06-00	<input type="checkbox"/> 06-01	<input checked="" type="checkbox"/> 11-45				

**Result:** ☒ pass ☐ fail ☐ not applicable ☐ not tested

**Results of the test**Client: *Phonak Communications AG*Equipment: *Roger MyLink*Operating mode: *Max. power, special communication test mode, modulated**T<sub>on</sub> = 0.184ms; T = 5.41 ms*Cables connected: *- - -*

Remarks: *Referenced to the effective radiated power under normal conditions (see § 8.1)*  
*Measured on temporary antenna connector with power-meter.*  
*External power supply on temporary battery connector and 2.1VDC "amplifier aid" supply*

Temp [C]	U [VDC]	f [GHz]	Duty cycle x [%]	Average power A [dBm]	EIRP calculated		Limit [dBm]	Pass	
					[dBm]	[mW]		Yes	No
22	1.20	2.402	3.4	-16.90	-20.75*	0.008	-10	<input checked="" type="checkbox"/>	<input type="checkbox"/>
22	1.20	2.440	3.4	-16.78	-18.05*	0.016	-10	<input checked="" type="checkbox"/>	<input type="checkbox"/>
22	1.20	2.480	3.4	-17.00	-18.65*	0.014	-10	<input checked="" type="checkbox"/>	<input type="checkbox"/>
-10	1.00	2.402	3.4	-15.99	-19.84	0.010	-10	<input checked="" type="checkbox"/>	<input type="checkbox"/>
-10	1.50	2.402	3.4	-16.00	-17.27	0.019	-10	<input checked="" type="checkbox"/>	<input type="checkbox"/>
-10	1.00	2.440	3.4	-15.66	-17.31	0.019	-10	<input checked="" type="checkbox"/>	<input type="checkbox"/>
-10	1.50	2.440	3.4	-15.69	-20.45	0.009	-10	<input checked="" type="checkbox"/>	<input type="checkbox"/>
-10	1.00	2.480	3.4	-15.58	-17.63	0.017	-10	<input checked="" type="checkbox"/>	<input type="checkbox"/>
-10	1.50	2.480	3.4	-15.59	-18.58	0.014	-10	<input checked="" type="checkbox"/>	<input type="checkbox"/>
60	1.00	2.402	3.4	-18.28	-23.34	0.005	-10	<input checked="" type="checkbox"/>	<input type="checkbox"/>
60	1.50	2.402	3.4	-18.31	-20.78	0.008	-10	<input checked="" type="checkbox"/>	<input type="checkbox"/>
60	1.00	2.440	3.4	-18.15	-21.21	0.008	-10	<input checked="" type="checkbox"/>	<input type="checkbox"/>
60	1.50	2.440	3.4	-18.13	-20.60	0.009	-10	<input checked="" type="checkbox"/>	<input type="checkbox"/>
60	1.00	2.480	3.4	-18.16	-17.90	0.016	-10	<input checked="" type="checkbox"/>	<input type="checkbox"/>
60	1.50	2.480	3.4	-18.21	-18.71	0.013	-10	<input checked="" type="checkbox"/>	<input type="checkbox"/>

\* values taken from § 8.1

Place and date of test:  
Operator:

*Rossens, January 29-30, 2013*  
*B. Itzcovich*