

Federal Communication Commission  
Equipment Authorization Division,  
Application Processing Branch  
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Columbia, MD 21048

**Phonak Communications AG**

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May 30, 2014

**TO WHOM IT MAY CONCERN**

Dear Sir/Madam,

Herewith we confirm that the transmitter emissions from the product:

FCC ID Number  
**KWCRF**

Trade Name/Model  
**Roger Focus**

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 0.03 mW (conducted power measurement results are enclosed as excerpt from Report No: 13-MO-0447.10 issued by Montena EMC on April 21, 2014). 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 0.01 which is 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,



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## 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.

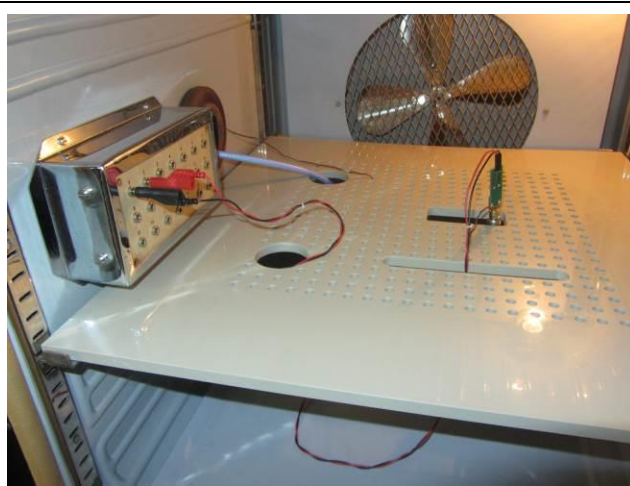
**Test site:** ☐ semi-anechoic chamber (foam) ☐ open test site  
☐ semi-anechoic chamber (ferrites) ☒ laboratory

**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 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 type="checkbox"/> 92-03	<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"/> 93-85	<input type="checkbox"/> 93-86	<input type="checkbox"/> 01-20	<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"/> 90-38	<input type="checkbox"/> 92-25	<input type="checkbox"/> 94-51	<input type="checkbox"/> 95-93	<input type="checkbox"/> 02-03	<input type="checkbox"/> 03-22
Power supply	<input type="checkbox"/> 99-04	<input checked="" type="checkbox"/> 99-07	<input 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
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 Focus*  
 Operating mode: *Max. power, special communication test mode, modulated*  
*T<sub>on</sub> = 0.184 ms; T = 5.00 ms*

Cables connected: *---*

Remarks: *Referenced to the effective radiated power under normal conditions (see § 8.1)*  
*Measured on temporary antenna connector with analyser*  
*(Peak detector sweep, 1001 pts, RBW = VBW = 1 MHz, ST = 30 s).*  
*External power supply on temporary battery connector.*

f [GHz]	Temp [°C]	U [VDC]	Peak cond. value [dBm]	EIRP calculated		Limit [dBm]	Remarks	Pass	
				[dBm]	[mW]			Yes	No
2.402	25	1.20	-0.84	-18.03	0.016	10	EIRP value taken from § 8.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	-11	1.00	-0.01	-17.19	0.019	10	---	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		1.50	0.03	-17.16	0.019	10	---	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	60	1.00	-1.77	-18.96	0.013	10	---	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		1.50	-1.78	-18.97	0.013	10	---	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	2.440	25	1.20	-0.65	-15.53	0.028	10	EIRP value taken from § 8.1	<input checked="" type="checkbox"/>
-11		1.00	0.06	-14.82	0.033	10	---	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		1.50	0.07	-14.81	0.033	10	---	<input checked="" type="checkbox"/>	<input type="checkbox"/>
60		1.00	-1.76	-16.64	0.022	10	---	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		1.50	-1.76	-16.64	0.022	10	---	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2.480		25	1.20	-0.99	-18.17	0.015	10	EIRP value taken from § 8.1	<input checked="" type="checkbox"/>
	-11	1.00	-0.42	-17.60	0.017	10	---	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		1.50	-0.35	-17.53	0.018	10	---	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	60	1.00	-2.22	-19.40	0.011	10	---	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		1.50	-2.16	-19.34	0.012	10	---	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Place and date of test:  
 Operator:

*Rossens, April 9, 2014*  
*B. Itzcovich*